

# APPENDICIES

# SECTION

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DRAFT PLAN JUNE 5TH 2025



DRAFT PLAN JUNE 5TH 2025

POPULATION  
FORECAST  
AND LAND  
CAPACITY  
ANALYSIS

1

appendix



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# APPENDIX 1. LAND CAPACITY ANALYSIS – METHODOLOGY AND RESULTS

## Introduction

Leland Consulting Group (LCG) was retained as part of a consultant team led by Otak to assist San Juan County in its 2025 Comprehensive Plan update. As part of this work, LCG conducted a Land Capacity Analysis (LCA) to determine potential development capacity for housing and jobs in the County through 2045, including capacity for housing units by income band to comply with recent updates to the GMA resulting from the passage of HB 1220. This report details the methodology and results of this analysis, which was based on the methodologies in the following documents and guidebooks:

- San Juan County 2036 Comprehensive Plan *Appendix 1: Population Projections and Land Capacity Analysis* (November 30, 2022)
- Department of Commerce *2023 Commerce Guidance for Updating Your Housing Element*, including new methodology for housing unit capacity analysis by income band to comply with HB 1220 requirements.
- Department of Commerce *2018 Buildable Lands Guidelines*
- Department of Commerce *2012 UGA Guidebook*

## Population, Housing, and Employment Projections

### Population Projections

**After analyzing several potential population projections based on Washington Office of Financial Management (OFM) forecasts, the San Juan County Council adopted Resolution no. 34-2023, adopting the forecasts by island shown below in**

Figure 1, based on the 2045 OFM Medium population forecasts. A full technical memo and discussion of these forecasts prepared by County staff can be found in Appendix A.

**Figure 1**  
**2045 San Juan County Population Forecasts by Island, 2023-2050, Based on OFM Medium**

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Island	2020 Census Population	2020 Population by Island (%)	Population Projections					
			2025	2030	2035	2040	2045	2050
San Juan (unincorp.)*	5,928	33%	6,229	6,509	6,745	6,938	7,087	7,270
Orcas	5,772	32%	6,130	6,485	6,826	7,154	7,468	7,774
Lopez	2,737	15%	2,907	3,075	3,237	3,392	3,541	3,686
Shaw	253	1%	269	284	299	314	327	341
Subtotal (unincorp.)	14,690	83%	15,535	16,353	17,107	17,798	18,423	19,071
Town of Friday Harbor	2,613	14.7%	2,841	3,087	3,356	3,647	3,964	4,281
Total Ferry Served Islands	17,303	97.3%	18,376	19,441	20,461	21,445	22,387	23,304
Blakely	41	0.23%	44	46	48	51	53	55
Brown	12	0.07%	13	13	14	15	16	16
Center	32	0.18%	34	36	38	40	41	43
Crane	15	0.08%	16	17	18	19	19	20
Decatur	71	0.40%	75	80	84	88	92	96
Johns	15	0.08%	16	17	18	19	19	20
Pearl	2	0.01%	2	2	2	2	3	3
Stuart	38	0.21%	40	43	45	47	49	51
Waldron	142	0.80%	151	160	168	176	184	191
Other Islands	117	0.66%	124	131	138	145	151	158
Total Non-Ferry-Served Islands	485		515	545	574	601	627	653
<b>TOTAL</b>	<b>17,788</b>	<b>100.00%</b>	<b>18,891</b>	<b>19,986</b>	<b>21,035</b>	<b>22,046</b>	<b>23,014</b>	<b>23,957</b>

Source: San Juan County Resolution 34-2023

The above forecasts reflect an allocation of 54 percent of San Juan Island’s net new population to the Town of Friday Harbor. In mid-2024, a series of discussions between the Town and the County resulted in a revision to this target, where the Town agreed to accept an allocation of 60 percent of the net new population of San Juan Island. In addition, following staff recommendations in the technical memo (see Appendix A), both the Eastsound and Lopez Village Urban Growth Areas (UGAs) were allocated 50 percent of net new population growth on Orcas and Lopez Islands, respectively. This is in following the Washington State Growth Management Act (GMA)

requirement to “encourage development in urban areas where adequate public facilities and services exist or can be provided in an efficient manner” (RCW 36.70A.020(1)) as well as San Juan County’s existing Comprehensive Plan policy found in Section B, Element 2 (Land Use), Policy (1)(13), which states that the County will “design urban growth areas to accommodate fifty percent (50%) of the twenty-year population growth projected for the island where the UGA is located.” The table below in Figure 2 shows the revised allocation of the above population totals broken out by Island, UGA, and the Town of Friday Harbor.

**Figure 2**  
**Net New Population 2020-2045 by Island and UGA (with Friday Harbor)**

	2020	2025	Net New Population 2020-2045	Share of Countywide Net New	Share of Net New Island Population
<b>San Juan Island</b>	<b>8,541</b>	<b>11,051</b>	<b>2,510</b>	<b>48.03%</b>	
Town of Friday Harbor	2,613	4,119	1,506	28.82%	60%
Unincorporated	5,928	6,932	1,004	19.21%	
<b>Orcas Island</b>	<b>5,772</b>	<b>7,468</b>	<b>1,696</b>	<b>32.45%</b>	
Eastsound UGA	1,200	2,047	847	16.21%	50%
Unincorporated	4,572	5,421	849	16.25%	
<b>Lopez Island</b>	<b>2,737</b>	<b>3,541</b>	<b>804</b>	<b>15.38%</b>	
Lopez Village UGA	233	634	401	7.67%	50%
Unincorporated	2,504	2,907	403	7.71%	
<b>Shaw Island</b>	<b>253</b>	<b>327</b>	<b>74</b>	<b>1.42%</b>	
<b>Non-Ferry-Served Islands</b>	<b>485</b>	<b>627</b>	<b>142</b>	<b>2.72%</b>	
<b>Total</b>	<b>17,788</b>	<b>23,014</b>	<b>5,226</b>	<b>100.00%</b>	

Source: San Juan County, Town of Friday Harbor, Leland Consulting Group

## Housing Needs

In addition to planning for the population targets shown above, updates to the GMA resulting from HB1220, now codified in RCW 36.70A.070(2)(a) and (c), require that jurisdictions also plan and show land capacity for sufficient housing units to meet the projected need at all income levels over the planning period. The Department of Commerce (Commerce) has developed a tool, the Housing for All Planning Tool (HAPT), which translates jurisdictions’ selected population targets into housing unit targets by jurisdiction and by income band. These housing unit targets incorporate a number of factors in addition to housing units needed for future population, as shown below:

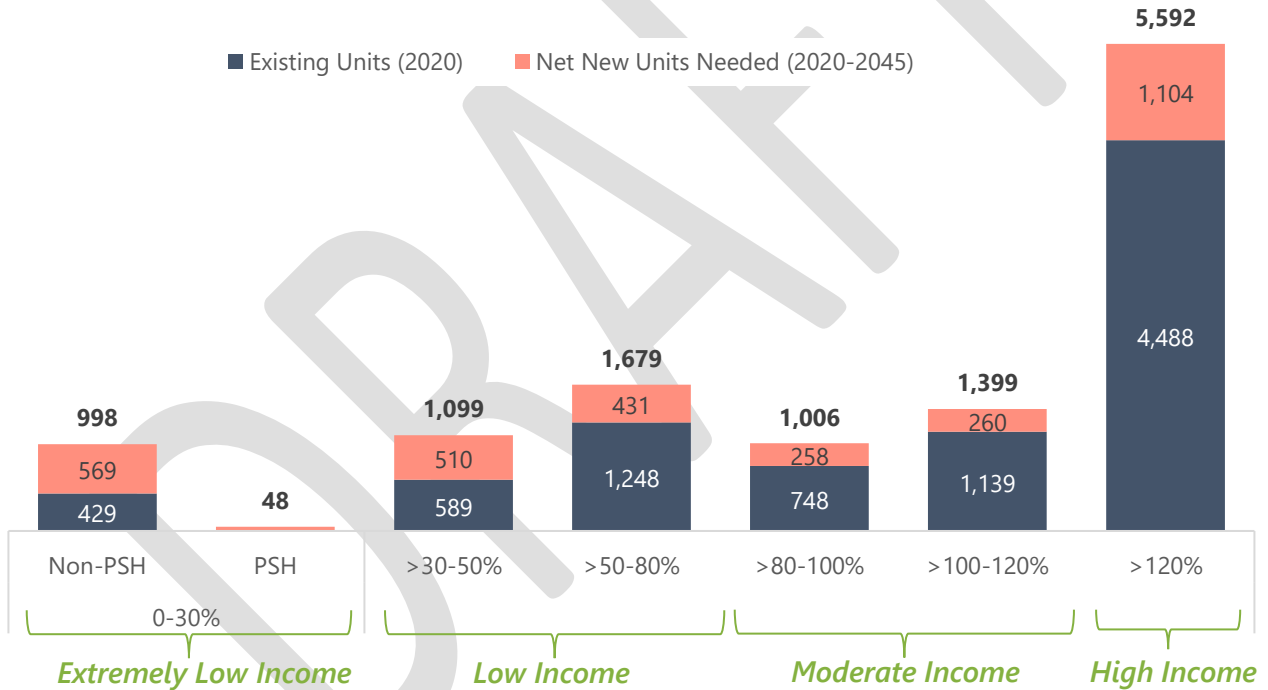
**Figure 3**  
**Commerce HAPT Tool Housing Projection Methodology**



Source: Washington Department of Commerce, "Establishing Housing Targets for your Community" (July 2023)

The HAPT tool generates a total countywide housing need for the planning period (2020-2045) by income level, as well as countywide needs for Emergency Housing (i.e. temporary shelter beds). The GMA requires that counties plan for these targets generated by the HAPT. San Juan County's targets are shown below in Figure 4.

**Figure 4**  
**San Juan County Existing and Target Housing Targets by Income Band, 2020-2045**



Source: Washington Department of Commerce HAPT Tool

Counties are required to allocate these targets to incorporated cities, UGAs, and unincorporated UGAs within the county, and each jurisdiction must then show sufficient land capacity to accommodate the needed units at the various income bands. Commerce provides several methodologies for counties to allocate their total housing targets to UGAs and cities, but counties ultimately have leeway to allocate them as they wish, as long as they meet certain requirements of the GMA. One of these key requirements is that rural areas cannot accommodate housing serving households earning under 50 percent AMI, since this housing is assumed to require a density beyond that which the GMA allows in rural areas (see box at right). However, counties can allocate some moderate-income housing to rural areas in the form of Accessory Dwelling Units (ADUs), as well as to Local Areas of More Intense Rural Development (LAMIRDS) outside of UGAs, in the form of limited capacity for ADUs and duplexes that can be accommodated with existing infrastructure in these areas.

**Showing Land Capacity by Income Band**

*Land capacity by income band is determined primarily by an assumed correlation between allowed housing types and incomes those housing types could potentially serve. In Commerce guidance, high-income households are assumed to be accommodated in low-density, single-family development. Moderate-income household capacity is shown through land uses that allow "middle housing" types such as duplexes, triplexes, and attached townhomes. Lower-income capacity is generally assumed to take the form of subsidized apartments. This connection between allowed housing types and income bands is flexible, and San Juan County's unique circumstances, particularly the provision*

Given the allocation of 60 percent of San Juan Island's net new population to the Town of Friday Harbor, 50 percent of Orcas and Lopez Island's net new population to UGAs, and after an analysis of the capacity for rural areas and LAMIRDS to accommodate moderate-income households, the County and Town of Friday Harbor, with assistance from Leland Consulting Group and BERK, developed the following allocation of countywide housing unit targets by income band to the Town, UGAs, LAMIRDS, and Rural Areas:

**Figure 5**  
**San Juan County Housing Allocations by Income Band and Area, 2020-2045**

	% of Total	Total	0-30%						Emergency Housing Needs	
			Non-PSH	PSH	>30-50%	>50-80%	>80-100%	>100-120%		>120%
<b>Friday Harbor City &amp; UGA</b>	29%	<b>916</b>	311	26	279	63	38	38	161	10
<b>Eastsound UGA</b>	16%	<b>515</b>	175	15	150	106	35	35	0	6
<b>Lopez Village UGA</b>	8%	<b>244</b>	83	7	81	49	12	12	0	3
<b>Rural Areas / LAMIRDS / AC</b>	47%	<b>1,504</b>	0	0	0	213	173	175	943	17

Source: WA Department of Commerce, San Juan County, Town of Friday Harbor, Leland Consulting Group

## Employment Projections

In addition to housing, jurisdictions planning under the GMA must also show sufficient land capacity in commercial and industrial lands to meet expected job growth. Unlike with housing, there is not a statewide tool or framework for developing these projections. In order to determine employment targets for San Juan County, the Town of Friday Harbor, and the County's UGAs, an employment forecast was developed using the same methodology as in the County's previous Comprehensive Plan. In brief, this methodology used the current ratio of jobs to households and the selected population forecast to determine future job projections. LCG modified this methodology slightly as well as analyzing jobs trends by island to confirm the trajectory of future jobs in the County.

**The employment targets and capacity in this analysis are aggregated by Census County Division (CCD), for consistency with the previous comprehensive plan and since this is the smallest geography at which reliable jobs data is available. The employment numbers in this analysis were drawn from the Census Bureau and Center for Economic Study's Longitudinal Employer-Household Dynamics (LEHD) dataset. These geographies are shown below in**

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Figure 6. Note that the Lopez CCD also contains Shaw, Decatur, and Blakely Islands, which results in lower employment numbers per capita in this CCD.

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**Figure 6**  
**Census County Subdivisions in San Juan County**



Source: U.S. Census Bureau TIGER/Line Shapefiles

### Jobs per Person Methodology

The first step in this process is to calculate current jobs per person by CCD. Additionally, jobs per person were calculated back to 2012 to analyze any relevant trends, particularly resulting from the COVID-19 pandemic. This data is shown below in Figure 7. Overall, the County’s Jobs-to-Person ratio has been consistent over the past decade. Only the Lopez Island CCD has seen a significant shift in the ratio from 0.24 in 2012 down to 0.19 in 2022.

**Figure 7**  
**Jobs, Population, and Jobs per Person Ratio in San Juan County, 2022**

	Countywide			San Juan Island CCD			Orcas Island CCD			Lopez Island CCD		
	Pop	Jobs	Ratio	Pop	Jobs	Ratio	Pop	Jobs	Ratio	Pop	Jobs	Ratio
<b>2012</b>	15,740	4,705	0.30	8,050	2,598	0.32	4,973	1,468	0.30	2,717	639	0.24
<b>2013</b>	15,786	4,899	0.31	7,929	2,737	0.35	5,056	1,497	0.30	2,801	665	0.24
<b>2014</b>	15,847	4,865	0.31	7,771	2,624	0.34	5,198	1,611	0.31	2,878	630	0.22
<b>2015</b>	15,956	4,944	0.31	7,483	2,699	0.36	5,467	1,630	0.30	3,006	615	0.20
<b>2016</b>	16,056	5,318	0.33	7,683	2,930	0.38	5,408	1,763	0.33	2,965	625	0.21
<b>2017</b>	16,221	5,353	0.33	7,810	2,950	0.38	5,481	1,754	0.32	2,930	649	0.22
<b>2018</b>	16,473	5,476	0.33	8,024	2,993	0.37	5,379	1,821	0.34	3,070	662	0.22
<b>2019</b>	16,788	5,461	0.33	8,107	3,001	0.37	5,515	1,810	0.33	3,166	650	0.21
<b>2020</b>	16,953	4,951	0.29	8,318	2,749	0.33	5,458	1,603	0.29	3,177	599	0.19
<b>2021</b>	17,631	5,080	0.29	8,568	2,727	0.32	5,534	1,696	0.31	3,529	657	0.19
<b>2022</b>	<b>18,001</b>	<b>5,450</b>	<b>0.30</b>	<b>8,953</b>	<b>2,924</b>	<b>0.33</b>	<b>5,452</b>	<b>1,849</b>	<b>0.34</b>	<b>3,596</b>	<b>677</b>	<b>0.19</b>

Source: US Census Bureau Longitudinal Employer-Household Dynamics (LEHD), Washington Office of Financial Management

Although there have been only small fluctuations in the jobs per person across the County, an average of the past ten years (2012-2022) was used to calculate the future ratio for the purposes of forecasting. Rather than eliminating the years during which the COVID-19 pandemic significantly disrupted employment, this average attempts to smooth out the effect of the pandemic while acknowledging that employment trends are likely to retain some effect from these years. Therefore it represents a middle ground between using a pre-pandemic jobs per person ratio and simply using the most recent 2022 number. The ratios used in the forecast are shown below:

**Figure 8**  
**Jobs per Person Ratios in San Juan County CCDs, 2012-2022**

	Average Jobs per Person 2012-2022
<b>San Juan Island CCD</b>	0.35
<b>Orcas Island CCD</b>	0.31
<b>Lopez Island CCD</b>	0.21

Source: US Census Bureau Longitudinal Employer-Household Dynamics (LEHD), Washington Office of Financial Management

Next, these ratios were multiplied by the population targets of the CCDs, as calculated based on the countywide housing allocations shown above in Figure 5. To break down the jobs targets by UGA and for the Town of Friday Harbor, the same methodology was used as in the distribution of population targets – 60 percent of the jobs on San Juan Island were allocated to Friday Harbor and 50 percent of the jobs on Orcas and Lopez islands were allocated to Eastsound and Lopez Village, respectively. The resulting jobs targets for the 2022-2045 period are shown below:

**Figure 9**  
**Employment Targets for San Juan County, 2022-2045**

	<b>2022-2045 Net New Jobs</b>
<b>San Juan Island</b>	
<b>CCD</b>	<b>938</b>
Friday Harbor	563
<b>Orcas Island CCD</b>	<b>494</b>
Eastsound UGA	247
<b>Lopez Island CCD</b>	<b>67</b>
Lopez Village	34
<b>Countywide Total</b>	<b>1,499</b>

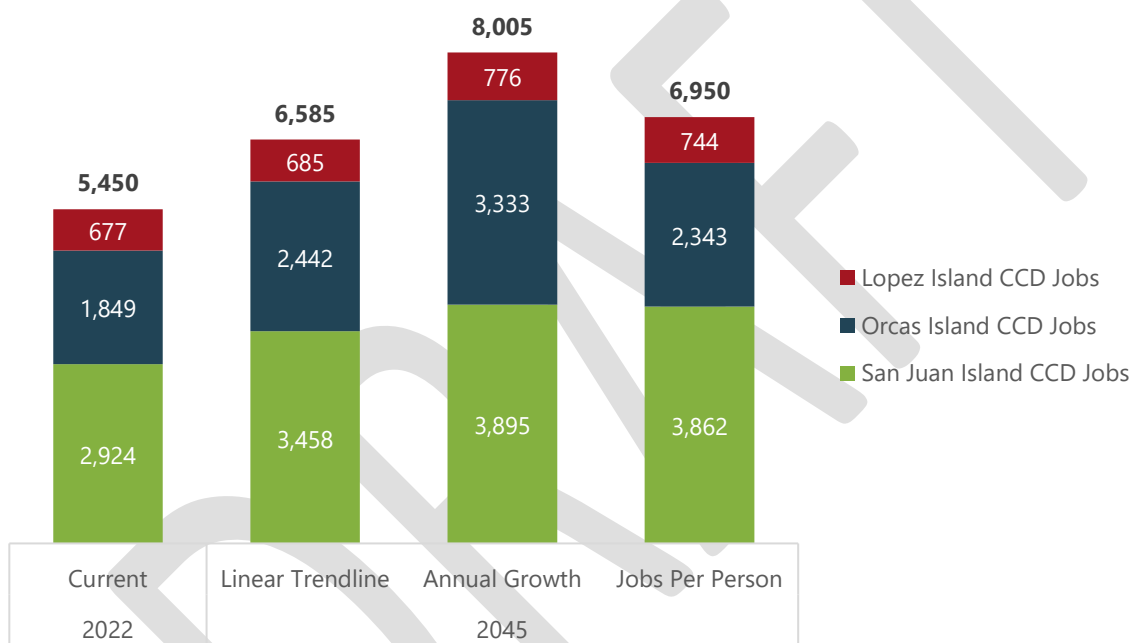
*Source: US Census Bureau Longitudinal Employer-Household Dynamics (LEHD), Washington Office of Financial Management, Leland Consulting Group*

**Employment Trend Verification**

In order to verify these targets with recent job trends, the trends of employment growth over the past 10 years were analyzed to 2045 using two methods. First, a linear trendline was calculated based on the past 10 years of growth. Second, job growth to 2045 was estimated using the average annual growth rate over the past 10 years. The results of these two methods of job forecasts are shown below, along with the results of the “Jobs per Person” methodology described above. As shown in

Figure 10, the selected “Jobs per Person” method strikes a balance between the linear job trends and the higher growth shown by assuming a continuation of the yearly growth rate. This shows that the selected job targets based on average jobs per person by CCD represent a reasonable continuation of the past 10 years of job trends in San Juan County.

**Figure 10**  
**San Juan County Employment Forecast Methodology Comparison, 2022-2045**



Source: US Census Bureau Longitudinal Employer-Household Dynamics (LEHD), Washington Office of Financial Management, Leland Consulting Group

## Parcel Classification

To determine developable land capacity in San Juan County, a set of assumptions was used to classify parcels as vacant, partially-used, or redevelopable. Critical area acreage and a Market Factor were then deducted to arrive at net buildable parcel acreage by land use designation. The assumptions and methodology for this process are detailed below.

### *Vacant*

Parcels in all land use designations were classified as Vacant if the San Juan County Assessor's improvement (building) value was less than \$10,000, or if the Assessor classified the parcel as "Undeveloped Land" (Assessor code 9100).

### *Partially-Used*

The Partially-Used classification refers to parcels in residential land use designations which are large enough to be subdivided without rezoning. Based on the previous Comprehensive Plan's LCA as well as input from staff, the land use designations considered residential in this analysis are: 2BDD, ACT, AG, C, all ER designations, FOR, HR, LGRA, LVR, OLGA, OVR2, RFF, RR, and VR/I. In these zones, parcels where the ratio of allowed density (acres per unit) to parcel size is less than or equal to 1/3 (0.333...) were classified as Partially-Used. In other words, parcels are considered to be subdividable if they are greater than three times the minimum lot size based on densities shown on the County's Comprehensive Plan maps by land use designation. In Eastsound, the densities were based on minimum lot size specified in the Eastsound Subarea Plan (SJCC 18.30.460-700). In calculating this classification in zones with density bonuses, only the base density was used.

Note that the previous LCA used a threshold of two times the minimum lot size to classify parcels as partially-used. Several Commerce guidebooks suggest the more conservative threshold of three times the minimum lot size which was used in this analysis. This allows leeway for parcels where the lot may not be subdividable even if it is technically large enough due to irregular shape, critical areas, or the orientation of existing structures.

Per Commerce guidance, very high value properties where the improvement (building) value was greater than the 93<sup>rd</sup> percentile of improvement values in the county (\$1,454,585) were also excluded, since it is unlikely that high-value homes on large properties would subdivide, and in order to attempt to create a more realistic set of subdividable parcels in the County.

### *Redevelopable*

This category applies to parcels which are in mixed-use or commercial/industrial land use designations. For this analysis, the following land use designations were considered mixed-use or commercial/industrial: CCC, EAD, HB, HI, IC, LVC, M, MC, OHC, OVC, OVT, RG, RI, SLI, SP, VC, VCL. In these land use designations, parcels are considered Redevelopable if the improvement (building) value is greater than \$10,000 (indicating the parcel is not vacant), and the improvement (building) value is less than the land value, indicating that a more intensive use could be developed on the land. Parcels are also considered redevelopable if the parcel currently shows a single-family use code in a zone that allows multifamily housing or commercial/industrial development.

### *Parcels Excluded From Analysis*

A number of parcels throughout the County were excluded from this analysis. These exclusion criteria were developed based on Commerce guidance, assessor codes excluded from the previous Comprehensive Plan's LCA and input from County staff, the Lopez Village and Eastsound Planning Review Commissions, and the San Juan County Planning Commission.

- In all land use designations, parcels with the following assessor codes were excluded
  - 1400 Residential Hotels/Condos
  - 9120-9123 Conservation Easements
  - 9300-9303 Water
  - 4500 Highway Right-Of-Way
  
- In all land use designations, parcels with assessor codes of 1200-1300 (multifamily use) and improvement to land value ratio of less than 1.0 were excluded
  
- In commercial/industrial land use designations, parcels with an improvement to land value ratio of greater than 1.0 and with the following assessor codes were excluded:
  - 1400-1488 Accommodations
  - 1600 Hotels/motels
  - 1700 Institutional lodging
  - 2100 Food and kindred products
  - 2200 Textile Mill Products
  - 2400-2403: Lumber/wood products
  - 2500 Furniture/fixtures
  - 2600 Paper and Allied products
  - 2700 Printing and publishing
  - 2800 Chemicals
  - 2900 Petroleum refining / related
  - 3100 Rubber misc. plastic products
  - 3200 Stone, clay and glass
  - 3300 Primary metal industries
  - 3400 Fabricated metal products
  - 3500 Prof. & Scientific Instruments
  - 3900 Misc. Manufacturing
  - 4100 Railroad and Transit
  - 4200 Motor vehicle transportation
  - 4300 Aircraft transportation
  - 4400 Marine transportation
  - 4600 Automobile parking
  - 4700 Communications
  - 4900 Other transportation
  - 5000 Non-residential condos
  - 5100 Wholesale trade
  - 5200 Building & hardware & farm
  - 5300-5320 General merchandise
  - 5400-5403 Retail food
  - 5500-5503 Retail-auto, marine, aircraft
  - 5600 Apparel
  - 5700-5708 Retail furniture and home furnishings
  - 5800 Retail- Eating and drinking
  - 5900 Other retail

- 6100 Finance, insurance & real estate
- 6200-6220 Personal services
- 6300 Business services
- 6400-6402 Repair services
- 6500-6503: Professional services
- 6600 Contract construct. services
- 6900-6902 Miscellaneous services
- 7100: Cultural activities
- 7200-7202: Public assembly
- 7300 Amusements
- 7400-7420 Recreational activities
- 7500 Resorts and group camps
- 7900 Other recreational
- 8100-8328: Agriculture
- 8400 Fishing and related services
- 8500 Mining activities
- 7600 Parks
- 4800-4820 Utilities
- 6800-6820 Educational services
- 6700-6793 Governmental services

In addition to these exclusions based on assessor codes, further parcels were excluded from the land capacity analysis as follows:

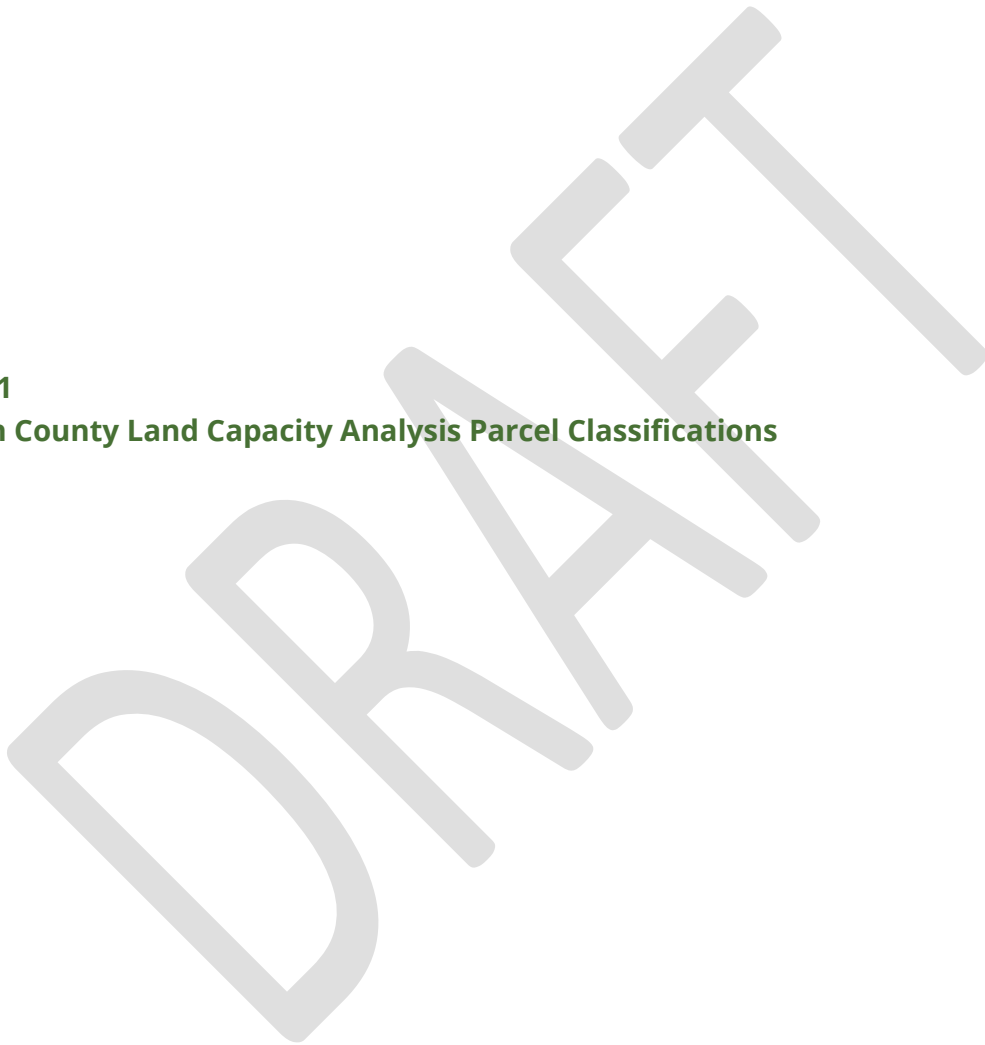
- All parcels in land use designations N (Natural), EN (Eastsound Natural), OCC (Olga Community Center), and HP (Hamlet Park)
- Parcels owned by the San Juan County Conservation Land Bank
- Mobile home parks
- Common areas of Condominiums
- All parcels which are made up entirely of a parking lot, regardless of assessor code
- Parcels in which the legal description indicates a conservation easement, regardless of assessor code
- Parcels for which there is a permit that has been finalized in the past five years or for which there is an outstanding permit.

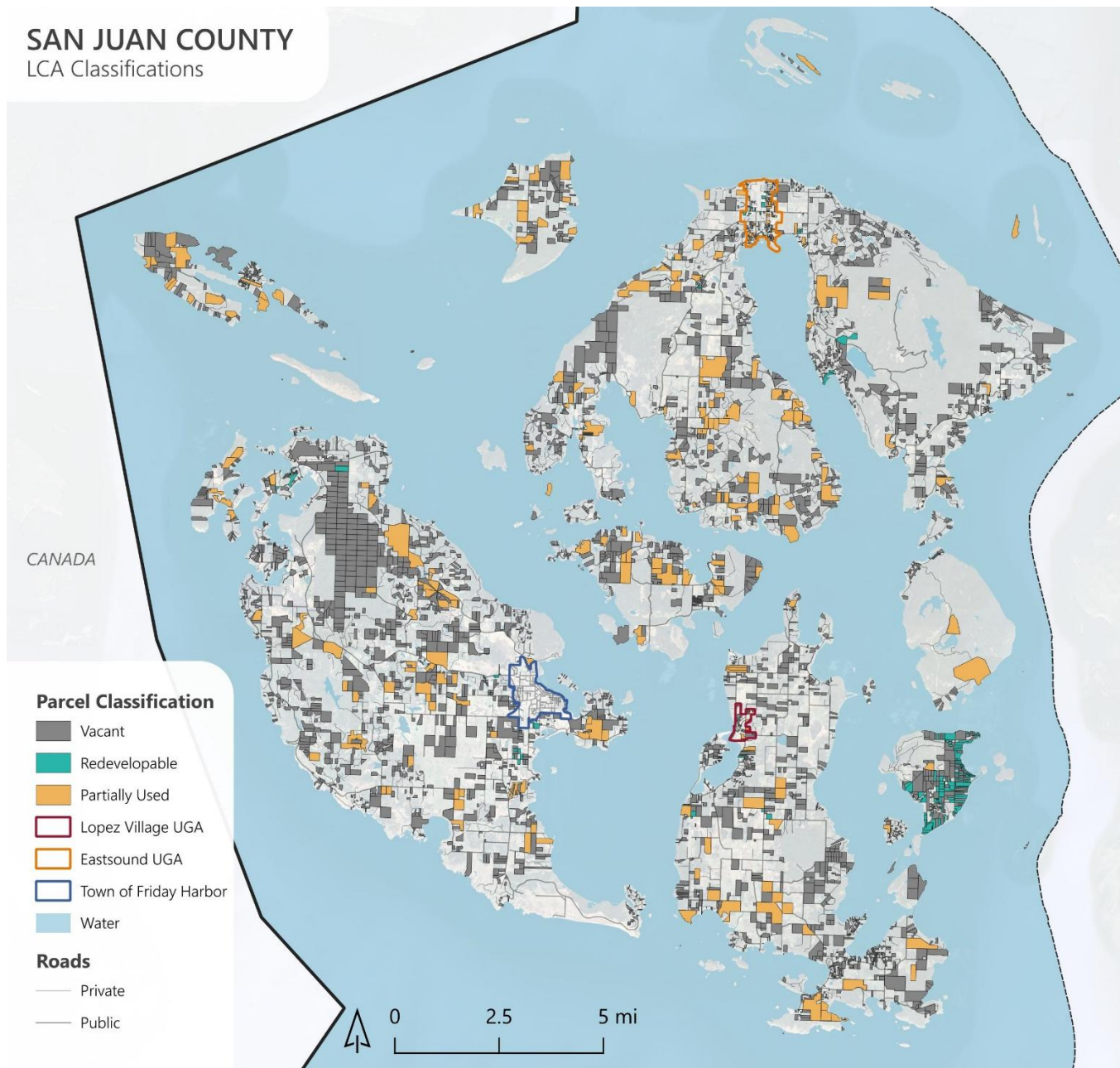
### *Staff and Committee Adjustments*

Following this initial parcel classification, maps were provided to County staff and the Eastsound and Lopez Village Planning Review Committees. These discussions resulted in further refinement of the parcel classifications, including identification of some recent or in-progress developments, several parcels which are unlikely to develop due to tribal or public ownership, undevelopable parcels in the Eastsound airport mis-classified by the assessor, and parcels unlikely to subdivide due to known deed restrictions.

The final map of parcels classified as vacant, partially-used, and redevelopable is shown below.

**Figure 11**  
**San Juan County Land Capacity Analysis Parcel Classifications**





### Critical Areas

Following the parcel classification, areas of vacant, partially-used, and redevelopable parcels that intersect with critical areas were removed, using the same methodology as the previous

Comprehensive Plan's LCA. Acreage of following areas intersecting vacant, partially-used, or redevelopable parcels was deducted from the total parcel acreage:

- **Wetlands:** The County's possible wetland inventory.
- **Streams:** The County's base stream dataset as well as the WFC stream dataset provided by the County, with stream centerlines and an assumed 35 feet of non-buildable area on either side of the centerline, corresponding with Tree Protection Zone 1 (TPZ 1) per SJCC Table 18.35.130-2.
- **Steep Slopes:** Areas with slopes greater than 50 percent which are considered Category 1 geo-hazards. Development in these areas is limited per SJCC 18.35.065.
- **Flood Plain:** Land located within 100-year floodplains as shown on the Federal Emergency Management Agency (FEMA), April 2017, Flood Insurance Rate Maps (FIRMS).

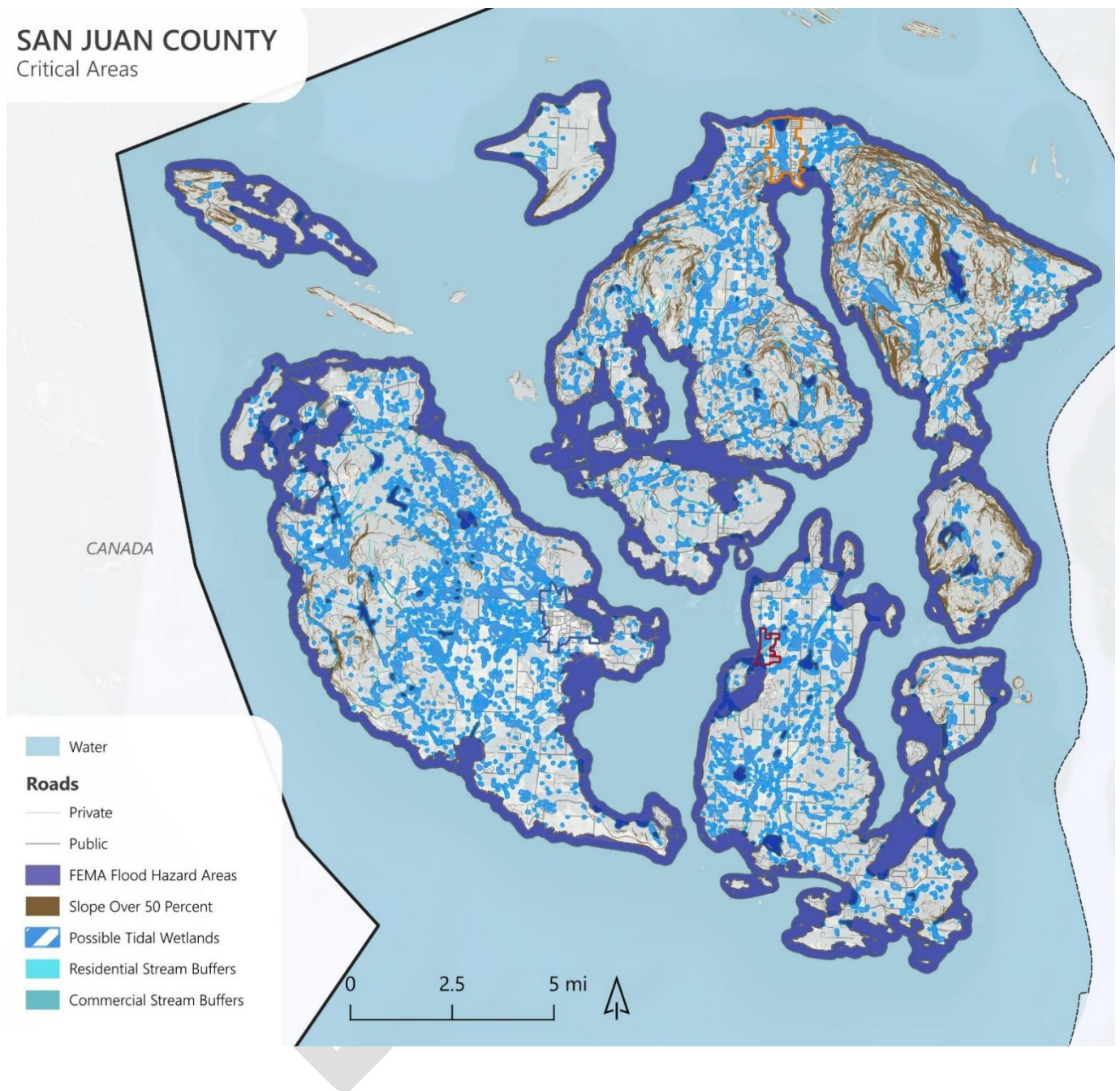
In addition, for Mixed-Use, Commercial, and Industrial land use designations only, increased buffers were applied to streams and wetlands. This is because the County's reasonable use exemption and other standards allow for flexible development of residential uses on parcels which contain critical areas, whereas standards for commercial development are more stringent. The increased buffers on non-residential vacant, partially-used, and redevelopable parcels were as follows, and are very similar to the buffers used in the previous Comprehensive Plan's LCA:

- A 150 foot wetland buffer because most of the County's wetlands are Class III or Class IV and industrial and commercial uses are designated high intensity uses (SJCC 18.35.095 and Tables 18.35.100-2 and 18.35.100-2),
- The following Tree Protection Zone buffers:
  - 110 feet from the centerline for Type F (Type 2 or 3) streams and ponds);
  - 50 feet from the centerline for Type Np (Type 4) streams;
  - 30 feet from the centerline for Type Ns (Type 5) streams; and
  - 30 feet from the centerline for un-typed streams.

A map of the critical areas used in this process is shown below:

**Figure 12**

### Critical Areas Used in San Juan County Land Capacity Analysis



**Market Factor**

Following these Critical Area deductions, an additional deduction for Market Factor was applied to all parcels. This deduction represents the fact that not all parcels will develop over the 20-year planning horizon due to fluctuations in the market and desires of individual property owners. For this analysis, the Market Factor was set at a 15 percent reduction for vacant parcels and a 25 percent reduction for partially-used and redevelopable parcels. This Market Factor is supported by Commerce’s most recent guidance in the August 2023 “Guidance for Updating your Housing Element”, as well as previous guidance in the UGA and Buildable lands Guidebooks. Additionally, the small sample size of data and atypical development patterns in San Juan County made further calculations of Market Factor at a more granular level very challenging. The baseline Commerce Market Factors were also used in the previous Comprehensive Plan’s LCA.

**Total Acreage**

The tables below show the vacant, redevelopable, partially-used, and total developable acreage by UGA, LAMIRD, and Rural Area (broken out by island), as well as the unconstrained acreage (after removing critical areas) and the net acres (after applying market factor reductions).

**Figure 13**  
**Developable Acreage in Eastsound and Lopez Village UGAs for Land Capacity Analysis**

UGA	Land Use Designation	Vacant			Redevelopable			Partially Used			Total Net Developable Acres	
		Gross Acres	Unconstrained Gross Acres	Net Acres	Gross Acres	Unconstrained Gross Acres	Net Acres	Gross Acres	Unconstrained Gross Acres	Reduction Factor		
Eastsound UGA	ER1	0.6	0.4	0.4	0.0	0.0	0.0	0.0	0.0	0.3	0.0	<b>0.4</b>
Eastsound UGA	ER1P	10.6	8.2	6.9	0.0	0.0	0.0	0.0	0.0	0.3	0.0	<b>6.9</b>
Eastsound UGA	ER2	5.7	5.2	4.4	0.0	0.0	0.0	11.2	9.0	0.3	6.8	<b>11.2</b>
Eastsound UGA	ER2P	2.9	2.5	2.1	0.0	0.0	0.0	9.1	7.9	0.3	5.9	<b>8.1</b>
Eastsound UGA	ER412	8.0	7.3	6.2	0.0	0.0	0.0	6.1	6.1	0.3	4.6	<b>10.8</b>
Eastsound UGA	ER4P	12.6	12.6	10.7	0.6	0.6	0.4	11.5	11.5	0.3	8.6	<b>19.7</b>
Eastsound UGA	M	0.0	0.0	0.0	2.9	2.0	1.5	0.0	0.0	0.3	0.0	<b>1.5</b>
Eastsound UGA	SL1	4.4	4.4	3.7	20.3	17.2	12.9	0.0	0.0	0.3	0.0	<b>16.6</b>
Eastsound UGA	VC	4.5	3.7	3.1	7.8	5.9	4.4	0.0	0.0	0.3	0.0	<b>7.6</b>
Eastsound UGA	VCL	1.2	1.2	1.0	0.9	0.9	0.7	0.0	0.0	0.3	0.0	<b>1.7</b>
Eastsound UGA	VR/I	8.8	8.8	7.5	0.0	0.0	0.0	21.2	20.5	0.3	15.4	<b>22.9</b>
Eastsound UGA	Airport 2	2.3	0.1	0.1	0.0	0.0	0.0	0.0	0.0	0.3	0.0	<b>0.1</b>
Eastsound UGA	Airport 3 Inner	0.9	0.7	0.6	3.1	0.0	0.0	1.6	1.0	0.3	0.7	<b>1.4</b>
Eastsound UGA	Airport 3 Outer	5.4	4.8	4.0	1.4	1.4	1.0	1.7	1.4	0.3	1.1	<b>6.1</b>
Eastsound UGA	Airport 4	4.3	2.1	1.8	0.0	0.0	0.0	0.0	0.0	0.3	0.0	<b>1.8</b>
Lopez Village UGA	LVC	5.3	3.0	2.5	4.1	3.4	2.6	0.0	0.0	0.3	0.0	<b>5.1</b>
Lopez Village UGA	LVR	35.3	29.4	25.0	0.0	0.0	0.0	32.8	28.2	0.3	21.1	<b>46.1</b>
Lopez Village UGA	LVI	2.3	2.3	2.0	0.0	0.0	0.0	0.0	0.0	0.3	0.0	<b>2.0</b>

**Figure 14**  
**Developable Acreage in LAMIRDS for Land Capacity Analysis**

Activity Center (LAMIRD)	Land Use Designation	Vacant			Redevelopable			Partially Used			Total Net Developable Acres		
		Gross Acres	Unconstrained Gross Acres	Net Acres	Gross Acres	Unconstrained Gross Acres	Net Acres	Gross Acres	Unconstrained Gross Acres	Reduction Factor		Net Acres	
Deer Harbor	HC	0.1	0.1	0.0	2.3	2.0	1.5	0.0	0.0	0.0	0.3	0.0	1.6
Deer Harbor	HI	4.0	3.2	2.8	2.3	1.0	0.7	0.0	0.0	0.3	0.0	0.0	3.5
Deer Harbor	HR	21.0	20.0	17.0	0.0	0.0	0.0	13.4	13.4	0.3	10.0	0.0	27.1
Doe Bay	ACT - Doe Bay	9.8	8.5	7.3	0.0	0.0	0.0	0.0	0.0	0.3	0.0	0.0	7.3
Island Center Lopez	IC (Lopez)	9.9	9.8	8.3	13.2	9.9	7.4	0.0	0.0	0.3	0.0	0.0	15.7
Island Center Orcas	IC (Orcas)	6.8	6.4	5.5	6.1	4.6	3.5	0.0	0.0	0.3	0.0	0.0	9.0
Marine Center	MC	10.9	10.8	9.2	4.8	4.3	3.3	0.0	0.0	0.3	0.0	0.0	12.4
Olga	OLGA	7.5	7.3	6.2	0.0	0.0	0.0	0.0	0.0	0.3	0.0	0.0	6.2
Orcas Village	OVC	0.0	0.0	0.0	4.8	4.6	3.5	0.0	0.0	0.3	0.0	0.0	3.5
Orcas Village	OVR2	12.5	10.5	8.9	0.0	0.0	0.0	6.1	5.0	0.3	3.7	0.0	12.6
Westsound	ACT - Westsound	0.6	0.5	0.4	0.0	0.0	0.0	7.9	6.5	0.3	4.9	0.0	5.3
Rosario	2 BDD	33.0	32.0	27.2	0.0	0.0	0.0	0.0	0.0	0.3	0.0	0.0	27.2
Rosario	ACT - Rosario	36.7	29.7	25.2	0.0	0.0	0.0	0.0	0.0	0.3	0.0	0.0	25.2
Rural Eastsound Subarea	CCC	0.0	0.0	0.0	5.0	5.0	3.8	0.0	0.0	0.3	0.0	0.0	3.8
Rural Eastsound Subarea	ER	59.0	51.3	43.6	0.0	0.0	0.0	0.0	0.0	0.3	0.0	0.0	43.6
Rural Eastsound Subarea	ER4P	28.1	28.1	23.9	0.0	0.0	0.0	0.0	0.0	0.3	0.0	0.0	23.9
Rural Eastsound Subarea	ERR	35.6	29.1	24.7	0.0	0.0	0.0	19.4	19.3	0.3	14.5	0.0	39.2
Rural Eastsound Subarea	ERRP2	14.3	13.6	11.6	0.0	0.0	0.0	19.4	18.6	0.3	13.9	0.0	25.5

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**Figure 15**  
**Developable Acreage in Rural Areas for Land Capacity Analysis**

Island	Land Use Designation	Vacant			Redevelopable			Partially Used				Total Net Developable
		Gross Acres	Unconstrained Gross Acres	Net Acres	Gross Acres	Unconstrained Gross Acres	Net Acres	Gross Acres	Unconstrained Gross Acres	Reduction Factor	Net Acres	
Blakely	FOR	6.7	6.1	5.2	0.0	0.0	0.0	291.7	233.9	0.3	175.4	180.6
Blakely	RFF	43.7	37.1	31.6	0.0	0.0	0.0	0.0	0.0	0.3	0.0	31.6
Blakely	RG	5.1	4.8	4.1	0.8	0.7	0.5	0.0	0.0	0.3	0.0	4.6
Blakely	RR	35.9	32.7	27.8	0.0	0.0	0.0	0.0	0.0	0.3	0.0	27.8
Brown	RR	7.2	6.3	5.4	0.0	0.0	0.0	0.0	0.0	0.3	0.0	5.4
Center	RR	31.5	30.5	25.9	0.0	0.0	0.0	15.4	15.0	0.3	11.2	37.1
Crane	RR	33.3	29.1	24.8	0.0	0.0	0.0	0.0	0.0	0.3	0.0	24.8
Decatur	RG	653.1	564.3	479.7	448.1	377.4	283.0	0.0	0.0	0.3	0.0	762.7
Decatur	RI	0.0	0.0	0.0	18.6	12.1	9.1	0.0	0.0	0.3	0.0	9.1
Decatur	RR	64.1	57.6	49.0	0.0	0.0	0.0	20.2	19.9	0.3	14.9	63.9
Johns	RFF	48.9	37.5	31.9	0.0	0.0	0.0	37.2	33.0	0.3	24.7	56.6
Johns	RR	24.8	19.9	16.9	0.0	0.0	0.0	0.0	0.0	0.3	0.0	16.9
Lopez	AG	586.9	477.3	405.7	0.0	0.0	0.0	364.5	318.8	0.3	239.1	644.8
Lopez	AG	161.0	145.5	123.7	0.0	0.0	0.0	0.0	0.0	0.3	0.0	123.7
Lopez	AG	80.5	71.4	60.7	0.0	0.0	0.0	0.0	0.0	0.3	0.0	60.7
Lopez	AG	155.4	125.9	107.0	0.0	0.0	0.0	127.2	114.7	0.3	86.0	193.0
Lopez	C	17.0	15.7	13.4	0.0	0.0	0.0	0.0	0.0	0.3	0.0	13.4
Lopez	FOR	557.5	505.3	429.5	0.0	0.0	0.0	0.0	0.0	0.3	0.0	429.5
Lopez	LGRA	1.3	1.3	1.1	0.0	0.0	0.0	15.2	14.4	0.3	10.8	11.9
Lopez	RFF	975.9	878.4	746.7	0.0	0.0	0.0	369.7	321.0	0.3	240.7	987.4
Lopez	RFF	872.6	803.1	682.6	0.0	0.0	0.0	269.1	254.0	0.3	190.5	873.2
Lopez	RFF	235.0	190.7	162.1	0.0	0.0	0.0	0.0	0.0	0.3	0.0	162.1
Lopez	RFF	6.7	6.7	5.7	0.0	0.0	0.0	0.0	0.0	0.3	0.0	5.7
Lopez	RG	16.8	14.0	11.9	0.0	0.0	0.0	0.0	0.0	0.3	0.0	11.9
Lopez	RG	1.0	1.0	0.8	1.3	1.3	1.0	0.0	0.0	0.3	0.0	1.8
Lopez	RI	1.6	1.6	1.3	10.0	9.9	7.4	0.0	0.0	0.3	0.0	8.7
Lopez	RR	92.2	79.1	67.3	0.0	0.0	0.0	0.0	0.0	0.3	0.0	67.3
Lopez	RR	26.5	24.6	20.9	0.0	0.0	0.0	89.7	86.0	0.3	64.5	85.4
Orcas	AG	137.2	130.0	110.5	0.0	0.0	0.0	65.9	38.2	0.3	28.6	139.1
Orcas	AG	251.1	226.5	192.5	0.0	0.0	0.0	178.1	126.5	0.3	94.9	287.4
Orcas	C	85.1	80.3	68.3	0.0	0.0	0.0	79.3	76.9	0.3	57.6	125.9
Orcas	FOR	2234.1	1611.0	1369.3	0.0	0.0	0.0	479.4	348.8	0.3	261.6	1630.9
Orcas	RFF	2884.5	2400.5	2040.4	0.0	0.0	0.0	1303.1	1093.8	0.3	820.4	2860.8
Orcas	RFF	107.9	78.8	66.9	0.0	0.0	0.0	0.0	0.0	0.3	0.0	66.9
Orcas	RFF	77.3	70.6	60.0	0.0	0.0	0.0	0.0	0.0	0.3	0.0	60.0
Orcas	RFF	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.3	0.0	0.0
Orcas	RR	323.2	237.6	202.0	0.0	0.0	0.0	0.0	0.0	0.3	0.0	202.0
Other Islands	C	35.8	26.8	22.8	0.0	0.0	0.0	89.5	75.3	0.3	56.4	79.3
Other Islands	C	120.0	91.9	78.1	0.0	0.0	0.0	0.0	0.0	0.3	0.0	78.1
Other Islands	C	0.4	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.3	0.0	0.0
Other Islands	RFF	180.7	166.2	141.3	0.0	0.0	0.0	112.4	87.1	0.3	65.3	206.6
Other Islands	RR	89.4	70.4	59.9	0.0	0.0	0.0	17.3	5.8	0.3	4.4	64.2
Pearl	RR	5.2	4.5	3.8	0.0	0.0	0.0	0.0	0.0	0.3	0.0	3.8
San Juan	AG	820.8	696.0	591.6	0.0	0.0	0.0	241.9	162.7	0.3	122.0	713.6
San Juan	AG	386.1	335.8	285.5	0.0	0.0	0.0	0.0	0.0	0.3	0.0	285.5
San Juan	C	47.7	35.3	30.0	0.0	0.0	0.0	0.0	0.0	0.3	0.0	30.0
San Juan	FHUA	0.2	0.2	0.2	0.0	0.0	0.0	0.0	0.0	0.3	0.0	0.2
San Juan	FOR	1.0	1.0	0.8	0.0	0.0	0.0	0.0	0.0	0.3	0.0	0.8
San Juan	FOR	600.2	534.5	454.4	0.0	0.0	0.0	0.0	0.0	0.3	0.0	454.4
San Juan	RFF	2468.1	2172.2	1846.3	0.0	0.0	0.0	1063.9	857.3	0.3	642.9	2489.3
San Juan	RFF	3021.4	2666.6	2266.6	0.0	0.0	0.0	425.9	319.6	0.3	239.7	2506.3
San Juan	RG	128.2	96.8	82.3	47.5	39.2	29.4	0.0	0.0	0.3	0.0	111.7
San Juan	RI	7.1	7.1	6.0	0.0	0.0	0.0	0.0	0.0	0.3	0.0	6.0
San Juan	RR	775.5	719.4	611.5	0.0	0.0	0.0	90.8	75.9	0.3	56.9	668.4
San Juan	RR	71.0	66.5	56.5	0.0	0.0	0.0	0.0	0.0	0.3	0.0	56.5
Shaw	C	0.0	0.0	0.0	0.0	0.0	0.0	18.7	17.9	0.3	13.4	13.4
Shaw	C	74.2	68.3	58.1	0.0	0.0	0.0	0.0	0.0	0.3	0.0	58.1
Shaw	FOR	190.9	176.4	149.9	0.0	0.0	0.0	91.7	84.9	0.3	63.7	213.6
Shaw	RFF	527.9	488.4	415.1	0.0	0.0	0.0	348.6	320.8	0.3	240.6	655.7
Shaw	RR	263.3	228.0	193.8	0.0	0.0	0.0	109.6	92.9	0.3	69.7	263.5
Stuart	RFF	245.2	197.4	167.8	0.0	0.0	0.0	164.8	143.6	0.3	107.7	275.5
Stuart	RFF	282.4	199.6	169.6	0.0	0.0	0.0	153.1	105.0	0.3	78.7	248.4
Stuart	RR	80.3	70.8	60.2	0.0	0.0	0.0	77.5	61.8	0.3	46.3	106.5
Waldron	C	4.4	1.9	1.6	0.0	0.0	0.0	0.0	0.0	0.3	0.0	1.6
Waldron	RFF	212.7	200.9	170.8	0.0	0.0	0.0	78.6	72.5	0.3	54.3	225.1
Waldron	RFF	445.9	428.2	364.0	0.0	0.0	0.0	254.5	234.9	0.3	176.2	540.2

## Density and Use Assumptions

Having established the total vacant, redevelopable, and partially-used acreage, the next step in the Land Capacity Analysis is to establish how much of the acreage will be developed with residential and commercial uses and to establish an assumed density of future development by land use designation. These assumptions are then multiplied by the potentially developed acres to determine capacity for housing units and jobs.

### Use Mix

Chapter 18.30 of the San Juan County Code contains use tables and descriptions of allowed uses within the County's land use designations. These use tables were supplemented by analysis of recent permit data to determine what percentage of available acreage by land use designation should be considered for residential and commercial development.

#### *Eastsound UGA*

**In the Eastsound UGA, the ER zones are residential by definition, and are assumed to develop with fully residential uses. The Marina zone has very little redevelopable acreage or recent development but allows a mix of residential and commercial uses and is therefore split evenly between residential and commercial uses. The VC, VCL, and VR/I zones allow a mix of uses. Analysis of recent permit data in the VC and VCL zones indicates that 12 percent of recently issued permits were for commercial uses. In the VR/I zone, 11 percent of recently issued permits were for commercial uses. The assumed residential share in these zones was set at 80 percent, to reflect a balance of recent permits and existing uses which are more evenly distributed between residential and commercial in these areas. The Airport overlay zones overlay the VC and VR/I areas, so the same share was assumed in these areas.**

Figure 16 shows these assumptions for the Eastsound UGA.

**Figure 16**  
**Assumed Residential/Commercial Mix in Eastsound UGA for LCA**

<b>Land Use Designation</b>	<b>Description</b>	<b>Assumed % Residential</b>
ER1	Eastsound Residential 1/acre	<b>100%</b>
ER1P	Eastsound Residential 1/acre P	<b>100%</b>
ER2	Eastsound Residential 2/acre	<b>100%</b>
ER2P	Eastsound Residential 2/acre P	<b>100%</b>
ER412	Eastsound Residential 4-12 units/acre	<b>100%</b>
ER4P	Eastsound Residential 4/acre P	<b>100%</b>
M	Marina	<b>50%</b>
SLI	Service Light Industrial	<b>0%</b>
VC	Village Commercial	<b>80%</b>
VCL	Village Commercial Limited	<b>80%</b>
VR/I	Village Residential / Institutional	<b>80%</b>
Airport 2	Airport 2	<b>80%</b>
Airport 3 Inner	Airport 3 Inner	<b>80%</b>
Airport 3 Outer	Airport 3 Outer	<b>80%</b>
Airport 4	Airport 4	<b>80%</b>

*Source: San Juan County Code, San Juan County Permit Data, Leland Consulting Group*

### **Lopez Village UGA**

In Lopez Village, there are three land use designations. The Lopez Village Commercial designation allows a mix of uses, with little recent activity and a broad mix of existing uses. Therefore, the residential/commercial split was set at 50 percent. The Lopez Village Residential designation is assumed to develop as 100 residential. The Lopez Village Institutional designation does not allow housing except as an accessory use, so is assumed to develop as 100 commercial.

**Activity Centers (LAMIRDS) and Rural Areas**

In Activity Centers and rural areas, capacity in residential land use designations was calculated as 100 percent residential uses, capacity in mixed-use designations (in Activity Centers) was split evenly between residential and commercial, and capacity in commercial and industrial areas was calculated as 100 percent commercial, as shown in the tables below.

**Figure 17**  
**Assumed Residential/Commercial Mix in Activity Centers for LCA**

<b>Area</b>	<b>Land Use Designation</b>	<b>Description</b>	<b>Assumed % Residential</b>
Deer Harbor	HC	Hamlet Commercial	50%
Deer Harbor	HI	Hamlet Industrial	0%
Deer Harbor	HR	Hamlet Residential	100%
Doe Bay	ACT - Doe Bay	Activity Center	100%
Island Center Lopez	IC (Lopez)	Island Center	50%
Island Center Orcas	IC (Orcas)	Island Center	50%
Marine Center	MC	Marine Center	50%
Olga	OLGA	Olga Hamlet	100%
Orcas Village	OVC	Orcas Village Commercial	0%
Orcas Village	OVR2	Orcas Village Residential	100%
Picnic AC	ACT - Picnic AC	Activity Center	100%
Rosario	2 BDD	2 Base Density District	100%
Rosario	ACT - Rosario	Activity Center	100%
Rural Eastsound Subarea	CCC	Country Corner Commercial	0%
Rural Eastsound Subarea	ER	Eastsound Rural	100%
Rural Eastsound Subarea	ER4P	Eastsound Residential 4/acre P	100%
Rural Eastsound Subarea	ERR	Eastsound Rural Residential	100%
Rural Eastsound Subarea	ERRP2	Eastsound Rural Residential 2/acre P	100%
Rural Eastsound Subarea	SP	Service Park	0%

**Figure 18**  
**Assumed Residential/Commercial Mix in Rural Areas for LCA**

<b>Land Use Designation</b>	<b>Description</b>	<b>Assumed % Residential</b>
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AG	Agricultural Resource Lands	100%
C	Conservancy	100%
FHUA	Friday Harbor Unincorporated UGA	100%
FOR	Forest Resource Lands	0%
LGRA	Lopez Village Growth Reserve Area	100%
RFF	Rural Farm-Forest	100%
RG	Rural General Use	0%
RI	Rural Industrial	0%
RR	Rural Residential	100%

## Residential Density

Next, residential density assumptions were developed for each area and land use designation. These densities are based on a combination of minimum and maximum allowed densities by land use designation in the San Juan County Code, supplemented with data on existing built density and recently permitted density. The selected densities represent an assumed future density (see box at right), balancing the realities of achieved densities by land use designation with potential densities which could serve a variety of income bands, and which may be seen in the future as the market shifts over time and various other factors come into play, such as the potential for increased county or state funding of affordable housing development.

### Commerce Guidance on Assumed Densities

*Commerce’s August 2023 “Guidance for Updating Your Housing Element” describes the purpose and considerations for assumed densities:*

*“Since the LCA is a forward-looking analysis, jurisdictions should focus on the level of development expected to occur during the planning period. Assumed densities for use in the LCA should consider the maximum densities allowed under zoning, and historic trends and achieved residential densities, as well as factors, which may cause trends to change in the future.”*

### Eastsound UGA

The assumed densities for Eastsound are shown below in

Figure 19. In general, the lower-density residential districts follow the maximum allowed zoning density, which is also reflected in recent and achieved development. In the VC, VCL, and VR/I zones, the assumed densities reflect a middle ground between what has been achieved recently

and what is allowed in the code. VC allows up to 40 units per acre, but the assumed density of 18 units per acre reflects more of a balance between the lower-density development seen in this zone and the potential for higher-density projects to be built over the planning horizon. The assumed 18 units per acre is still lower than the maximum recently achieved density of 27.5 units per acre. In the airport overlay zones, density maximums are reduced due to FAA regulations. Most parcels in the airport overlays are in the VC or VR/I land use designations, which allow a maximum of 12-40 units per acre, so the maximum allowed densities within the airport overlays are used, since they are significantly lower than the densities otherwise allowed in those areas. Since the Airport 3 Outer overlay also contains some parcels in the ER4P designation, an assumed density below the maximum of 8 units per acre is used.

**Figure 19**  
**Eastsound UGA Achieved, Recent (2019-2024) and Assumed Densities for LCA**

Zone	Description	Minimum Density (du/ac)	Maximum Density (du/ac)	Average Total Achieved Density (du/ac)	Average Recent Density (du/ac)	Maximum Recent/Achieved Density (du/ac)	Assumed Density for LCA (du/ac)
ER1	Eastsound Residential 1/acre		1	1.0	1.8		1.0
ER1P	Eastsound Residential 1/acre P		1	0.9			1.0
ER2	Eastsound Residential 2/acre		2	1.9	1.3		2.0
ER2P	Eastsound Residential 2/acre P		2	1.4	1.4		2.0
ER412	Eastsound Residential 4-12 units/acre	4	12	5.8	5.5	10.8	8.0
ER4P	Eastsound Residential 4/acre P		4	2.5	4.1		4.0
M	Marina	6	8	2.9			7.0
SLI	Service Light Industrial						
VC	Village Commercial	4	40	4.5	9.7	27.5	18.0
VCL	Village Commercial Limited	4	40	2.8			15.0
VR/I	Village Residential / Institutional	4	12	1.8	3	12.0	8.0
Airport 2	Airport 2		1				1.0
Airport 3 Inner	Airport 3 Inner		4				4.0
Airport 3 Outer	Airport 3 Outer		8				6.0
Airport 4	Airport 4		4				4.0

**Lopez Village UGA**

In Lopez Village, density bonuses for affordable housing and for efficient water usage allow densities up to 12 units per acre. Such densities do exist in the Commercial area, so an assumed density of 10 units per acre was used. In the residential area, the average achieved density is only 2.4 units per acre, but this includes development prior to the adoption of regulations precluding subdivision of parcels at a density less than 6 units per acre. Given that projects exist that have

exceeded 6 units per acre, and that projects taking advantage of the density bonus have been constructed in the UGA, an assumed density slightly higher than the base 6 units per acre was chosen, but not as high as in the commercial area. These density assumptions balance the capacity of the UGA to accommodate lower-income units using the density bonus while also acknowledging the reality that lower-density development is likely to continue in Lopez Village.

**Figure 20**  
**Lopez Village UGA Achieved, Recent (2019-2024) and Assumed Densities for LCA**

Zone	Description	Minimum Density (du/ac)	Maximum Density (du/ac)	Average Existing Density (du/ac)	Maximum Existing Density (du/ac)	Assumed Density for LCA (du/ac)
LVC	Lopez Village Commercial	none	12	5.0	14.0	<b>10.0</b>
LVR	Lopez Village Residential	6	12	2.4	7.6	<b>8.0</b>

**Activity Centers (LAMIRDS) and Rural Areas**

In LAMIRDS, the majority of land use designations allow very low densities of between 0.2 and 0.5 units per acre. However, the HC, HR, ACT – Doe Bay, OLGA, and ACT-Rosario land use designations allow densities up to 2 units per acre when affordable housing is provided. Based on staff feedback, these bonuses are infrequently used. For the purposes of this analysis, capacity was analyzed using an assumption that 90 percent of development in these areas would be market-rate at the lower density, and 10 percent may use the affordability bonus at the higher density, bringing the weighted average up slightly in these areas as shown below in Figure 21. This balances the potential for lower-income units in Activity Centers with the reality that they are infrequently developed in these areas. Note that in Island Center designations on Lopez and Orcas, only one dwelling unit per lot is allowed, and only as secondary to a commercial use. Therefore, a density assumption was not used, and instead capacity was calculated based on the number of lots in these designations – three lots in IC (Lopez) and eight lots in IC (Orcas).

**Figure 21**  
**Activity Center (LAMIRD) Achieved, Recent (2019-2024) and Assumed Densities for LCA**

Area	Zone	Description	Maximum Density (du/ac)	Existing Density (du/ac)	Recent Permit Density (du/ac)	Assumed Market-Rate Density	Market Rate %	Assumed Affordable Density	Assumed Affordable %	Assumed Density for LCA (du/ac)
Deer Harbor	HC	Hamlet Commercial	0.5	0.85		0.5	90%	2.0	10%	0.7
Deer Harbor	HR	Hamlet Residential	0.5	0.35	0.1	0.5	90%	2.0	10%	0.7
Doe Bay	ACT - Doe Bay	Activity Center	0.2	0.87		0.2	90%	2.0	10%	0.4
Marine Center	MC	Marine Center	4	0.95						1.0
Olga	OLGA	Olga Hamlet	0.5	2.13	3.5	0.5	90%	2.0	10%	0.7
Orcas Village	OVR2	Orcas Village Residential	0.5	0.67	1.0					0.5
Picnic AC	ACT - Picnic AC	Activity Center	0.5	0.72	0.5					0.5
Rosario	2 BDD	2 Base Density District	2	0.82	0.43	1	90%	2.0	10%	1.1
Rosario	ACT - Rosario	Activity Center	0.5	1.15	2.2	0.5	90%	2.0	10%	0.7
Rural Eastsound Subarea	ER	Eastsound Rural	0.2	0.13	0.4					0.2
Rural Eastsound Subarea	ER4P	Eastsound Residential 4/acre P	4	2.50	4.1					4.0
Rural Eastsound Subarea	ERR	Eastsound Rural Residential	0.2	0.71	0.716					0.2
Rural Eastsound Subarea	ERRP2	Eastsound Rural Residential 2/acre P	0.5	0.71	1.71					1.7

In rural areas, densities were calculated based on the densities (expressed in *acres per dwelling unit*) shown on the San Juan County official land use maps. These densities are shown below, broken out by island and land use designation.

**Figure 22**  
**Rural Achieved, Recent (2019-2024) and Assumed Densities for LCA**

Area	LU Designation	Description	Density (acres per unit)
Blakely	RFF	Rural Farm-Forest	5
Blakely	RR	Rural Residential	5
Brown	RR	Rural Residential	5
Center	RR	Rural Residential	5
Crane	RR	Rural Residential	5
Decatur	RR	Rural Residential	5
Johns	RFF	Rural Farm-Forest	5
Johns	RR	Rural Residential	5
Lopez	AG	Agricultural Resource Lands	10
Lopez	AG	Agricultural Resource Lands	15
Lopez	AG	Agricultural Resource Lands	20
Lopez	AG	Agricultural Resource Lands	40
Lopez	C	Conservancy	10
Lopez	LGRA	Lopez Village Growth Reserve Area	5
Lopez	RFF	Rural Farm-Forest	5
Lopez	RFF	Rural Farm-Forest	10
Lopez	RFF	Rural Farm-Forest	15
Lopez	RFF	Rural Farm-Forest	20
Lopez	RR	Rural Residential	5
Lopez	RR	Rural Residential	10
Orcas	AG	Agricultural Resource Lands	10
Orcas	AG	Agricultural Resource Lands	20
Orcas	C	Conservancy	5
Orcas	RFF	Rural Farm-Forest	5
Orcas	RFF	Rural Farm-Forest	10
Orcas	RFF	Rural Farm-Forest	20
Orcas	RFF	Rural Farm-Forest	W
Orcas	RR	Rural Residential	5
Other Islands	C	Conservancy	5
Other Islands	C	Conservancy	10
Other Islands	C	Conservancy	P
Other Islands	RFF	Rural Farm-Forest	5
Other Islands	RR	Rural Residential	5
Pearl	RR	Rural Residential	5
San Juan	AG	Agricultural Resource Lands	10
San Juan	AG	Agricultural Resource Lands	40
San Juan	C	Conservancy	10
San Juan	FHUA	Friday Harbor Unincorporated UGA	0.25
San Juan	RFF	Rural Farm-Forest	5
San Juan	RFF	Rural Farm-Forest	10
San Juan	RR	Rural Residential	5
San Juan	RR	Rural Residential	10
Shaw	C	Conservancy	5
Shaw	C	Conservancy	P
Shaw	RFF	Rural Farm-Forest	5
Shaw	RR	Rural Residential	5
Stuart	RFF	Rural Farm-Forest	5
Stuart	RFF	Rural Farm-Forest	10
Stuart	RR	Rural Residential	5
Waldron	C	Conservancy	10
Waldron	RFF	Rural Farm-Forest	5
Waldron	RFF	Rural Farm-Forest	10

**Commercial**

**Density**

To calculate potential employment density on vacant, underutilized, and partially-used parcels, an assumption of jobs per acre was developed for each commercial and mixed-use land use designation, and applied to the developable acreage. This used data on existing commercial FAR by land use designation and average square feet per job by CCD gathered and calculated during the previous Comprehensive Plan's LCA. Since very little commercial development has occurred in the County since the previous plan was developed, staff and the consultant team determined that these numbers were sufficiently accurate to use in this analysis. Unlike the previous LCA, this analysis does not consider maximum and achieved FAR, since using maximum FAR results in unrealistically high jobs counts. Using the more conservative achieved FAR is more representative of potential future employment numbers in the County. The tables below show the achieved FAR, square feet per job, and assumed job density expressed in jobs per acre used in this LCA.

**Figure 23**  
**Eastsound UGA Assumed Job Density by Land Use Designation for LCA**

<b>Zone</b>	<b>Description</b>	<b>Achieved Density (FAR)</b>	<b>Square Feet per Job</b>	<b>Assumed Job Density (Jobs/Acre)</b>
M	Marina	0.03	531.0	<b>2.8</b>
SLI	Service Light Industrial	0.47	531.0	<b>38.2</b>
VC	Village Commercial	0.39	531.0	<b>32.0</b>
VCL	Village Commercial Limited	0.39	531.0	<b>32.0</b>
VR/I	Village Residential / Institutional	0.16	531.0	<b>12.7</b>
Airport 2	Airport 2	0.47	531.0	<b>38.6</b>
Airport 3 Inner	Airport 3 Inner	0.16	531.0	<b>13.1</b>
Airport 3 Outer	Airport 3 Outer	0.16	531.0	<b>13.1</b>
Airport 4	Airport 4	0.16	531.0	<b>13.1</b>

**Figure 24**  
**Lopez Village UGA Assumed Job Density by Land Use Designation for LCA**

<b>Zone</b>	<b>Description</b>	<b>Achieved FAR</b>	<b>Square Feet per Job</b>	<b>Assumed Job Density for LCA (Jobs/Acre)</b>
LVC	Lopez Village Commercial	0.9	<b>415.3</b>	<b>95.9</b>
LVR	Lopez Village Residential	0.9	<b>415.3</b>	<b>95.9</b>
LVI	Lopez Village Institutional	0.9	<b>415.3</b>	<b>95.9</b>

**Figure 25**  
**LAMIRD/Activity Center Assumed Job Density by Land Use Designation for LCA**

Area	Zone	Description	LU Type	Achieved Job Density (FAR)	Square Feet per Job	Assumed Job Density (Jobs/Acre)
Deer Harbor	HC	Hamlet Commercial	Mixed Use	0.30	531.0	24.5
Deer Harbor	HI	Hamlet Industrial	Commercial/Industrial	0.03	531.0	2.1
Island Center Lopez	IC (Lopez)	Island Center Lopez	Mixed Use	0.22	415.3	23.0
Island Center Orcas	IC (Orcas)	Island Center Orcas	Mixed Use	0.22	415.3	23.0
Orcas Village	OVC	Orcas Village Commercial	Commercial/Industrial	0.15	531.0	12.5
Rural Eastsound Subarea	CCC	Country Corner Commercial	Commercial/Industrial	0.15	531.0	12.3
Rural Eastsound Subarea	SP	Service Park	Commercial/Industrial	0.15	531.0	12.5

**Figure 26**  
**Rural Areas Assumed Job Density by Zone for LCA**

Area	Zone	Description	Achieved FAR	Square Feet per Job	Assumed Density (Jobs/Ac)
Blakely	RG	Rural General Use	0.12	454.11	11.7
Decatur	RG	Rural General Use	0.12	454.11	11.7
Decatur	RI	Rural Industrial	0.03	454.11	2.5
Lopez	RG	Rural General Use	0.12	415.27	12.8
Lopez	RG	Rural General Use	0.12	415.27	12.8
Lopez	RI	Rural Industrial	0.03	415.27	2.7
San Juan	RG	Rural General Use	0.12	314.74	16.9
San Juan	RI	Rural Industrial	0.03	314.74	3.6

### Seasonal, Recreational, and Occasional Use Deduction

San Juan County has a large number of vacation rentals and second homes. These uses can prevent housing units from being available to full-time residents of the County. Commerce guidance suggests that jurisdictions should calculate their land capacity for permanent units available to full-time residents and treat vacation rentals and second homes as extra units outside the scope of the LCA. The previous Comprehensive Plan’s LCA used a reduction factor of 35 percent of units based on a Countywide estimate drawn from state data to account for this housing stock unavailable to full-time residents.

**For this analysis, two data sources were used to determine more specific rates of vacation rentals and second homes by island and by UGA. First, the American Community Survey (ACS), administered by the Census Bureau, provides counts of units which are used for “Seasonal, Recreational and Occasional Use” (SRO), as a subset of vacancy data. This data was available down to the CCD level (see**

**Figure 6**

Census County Subdivisions in San Juan County above for a map of CCDs). Statistics for the Town of Friday Harbor are also shown based on ACS data. The data from Friday Harbor shows that SRO uses are less common in the town than in the unincorporated areas of San Juan Island. In order to determine if this trend was also consistent in the County’s UGAs, data from the Washington Office of Financial Management’s Small Area Estimates Program (SAEP) at the UGA level was analyzed. This data does not break down vacancy into categories as the census does, but as shown below in Figure 27

Seasonal, Recreational, and Occasional Use Housing in San Juan County, 2022 the SAEP data also shows that overall vacancy rates are lower inside UGAs.

**Figure 27**

**Seasonal, Recreational, and Occasional Use Housing in San Juan County, 2022**

Island	Total Units	Vacant Units	SRO Units	Share of Countywide Vacant Units	Vacancy Rate	SRO Rate
County Total	13,851	5,197	4,568	100.00%	37.52%	32.98%
Lopez CCD	3,448	1,713	1,595	32.96%	49.68%	46.26%
<i>Lopez Village UGA (SAEP)</i>	<i>146</i>	<i>27</i>			<i>18.49%</i>	
Orcas CCD	4,542	1,813	1,557	34.89%	39.92%	34.28%
<i>Eastsound UGA (SAEP)</i>	<i>745</i>	<i>164</i>			<i>22.01%</i>	
San Juan CCD	5,861	1,671	1,416	32.15%	28.51%	24.16%
<i>Friday Harbor</i>	<i>1,397</i>	<i>219</i>	<i>106</i>	<i>4.21%</i>	<i>15.68%</i>	<i>7.59%</i>
<i>Unincorporated</i>	<i>4,464</i>	<i>1,452</i>	<i>1,310</i>	<i>27.94%</i>	<i>32.53%</i>	<i>29.35%</i>

Source: 2022 American Community Survey 5-Year Estimates, Table B25004; Washington Office of Financial Management 2022 Small Area Estimates Program (SAEP)

In addition, data was provided to the County from Madrona Voices and the Eastsound Water Users Association from a survey of homes in the UGA with reduced or minimal water use at certain times of year. Given this data, as well as input from County staff, planning review commissions, and stakeholders, specific SRO reduction factors were developed for UGAs and by CCD outside of UGAs. The SRO deduction factors are shown below in

Figure 28.

**Figure 28**  
**Seasonal, Occasional, and Recreational Use Rates in San Juan County for LCA**

<b>Census County Division (CCD)</b>	<b>Seasonal, Recreational, and Occasional Use Reduction Rate</b>
<b>San Juan CCD (outside Friday Harbor)</b>	29%
<b>Orcas CCD</b>	
Eastsound UGA	33%
Outside Eastsound UGA	34%
<b>Lopez CCD (including Waldron, Blakely, and Shaw)</b>	
Lopez Village UGA	20%
Outside Lopez Village UGA	46%
<b>Other</b>	33%

In addition to providing more location-specific rates, these reduction factors also reflect the GMA policy that subsidized affordable housing, which caters to the islands’ full-time residents, be concentrated within UGAs, and reflects on-the-ground realities of such housing being developed by Community Land Trusts within UGAs in recent years. Additionally, the County has recently established caps on the quantity of new vacation rental permits available by island. Although this regulation will not affect second home owners, it may reduce the number or share of vacation rentals in San Juan County over this planning period. However, in the interest of a conservative estimate and to ensure that the reduction in year-round housing resulting from SRO uses is adequately captured in the LCA, the recent vacation rental caps were not taken into account when developing these reduction factors.

## Income Band Classifications

As discussed earlier in this report, updates to the GMA resulting from HB1220, now codified in RCW 36.70A.070(2)(a) and (c), require that jurisdictions also plan and show land capacity for sufficient housing units to meet the projected need at all income levels over the planning period. This classification of land capacity by income band is tied to housing types. The table below, from

Commerce’s August 2023 “Guidance for Updating Your Housing Element,” shows the connection between land use, housing type, and potential income band served.

**Figure 29**  
**Department of Commerce Guidance on Relating Land Use to Income Bands**

Zone category	Typical housing types allowed	Lowest potential income level served		Assumed affordability level for capacity analysis
		Market rate	With subsidies and/or incentives	
Low Density	Detached single family homes	Higher income (>120% AMI)	Not typically feasible at scale*	Higher income (>120% AMI)
Moderate Density	Townhomes, duplex, triplex, quadplex	Moderate income (>80-120% AMI)	Not typically feasible at scale*	Moderate income (>80-120% AMI)
Low-Rise Multifamily	Walk-up apartments, condominiums (2-3-floors)	Low income (>50-80% AMI)	Extremely low and Very low income (0-50% AMI)	Low income (0-80% AMI) and PSH
Mid-Rise Multifamily	Apartments, condominiums	Low income (>50-80% AMI)	Extremely low and Very low income (0-50% AMI)	Low income (0-80% AMI) and PSH
ADUs (all zones)	Accessory Dwelling Units on developed residential lots	Low income (>50-80% AMI)	N/A	Low income (>50-80% AMI) – Group with Low-Rise and/or Mid-Rise Multifamily

Source: Washington Department of Commerce, “Guidance for Updating Your Housing Element” (August 2023)

Given San Juan County’s unique housing environment, where Community Land Trust (CLTs) provide the majority of subsidized affordable housing units, this framework was used as a starting point and adjusted to reflect on-the-ground realities. Although subsidized affordable housing across the state is primarily provided through multifamily apartments built using the Low-Income Housing Tax Credit and other incentives and funding programs, many CLT projects in San Juan County are made up of smaller detached or attached units at low- and moderate-densities. For example, several projects currently in development or recently completed are providing units at 80 percent AMI or even lower at densities between 4 and 12 units per acre. Additionally, little to no apartment construction has occurred in the County for at least 20 or more years. Therefore, the categorization of potential units by income band was modified in various ways to reflect both the potential for apartments to be built in some UGA areas which allow sufficient density as well as the potential for continued provision of subsidized housing at lower densities by CLTs, as detailed below.

### Pending Units

Commerce’s housing unit targets generated by the HAPT (see “Housing Needs” on p. 3) use a 2020 baseline. As a result, all units built since 2020 or currently in the development pipeline count towards the County’s 2020-2045 housing target. County staff provided building permit data for units built since 2020 and current permits. In addition, staff provided details on several Community Land Trust (CLT) projects in development, and the Eastsound and Lopez Planning

Review Commissions provided feedback on pending units as well. The tables below show the pending parcel counts, income band classifications that the units are expected to serve, and other details.

### Eastsound UGA

In Eastsound, there are two CLT projects in development by Opal Community Land Trust – 10 units at Kidder Way, which will serve households earning 80-120% AMI and 20 units at the Cottages at Pea Patch, which will serve households earning 80% AMI or below. There are also 41 units at April’s Grove serving households earning under 80% AMI completed in 2021. The categorization of single-family, middle housing, and ADUs follows the Commerce guidance shown above. For manufactured homes, LCG analyzed a number of units sold over the past several years in San Juan County. The average manufactured home was selling for about 82 percent AMI, so these units are categorized in the 80-120% AMI category.

**Figure 30**  
**Eastsound UGA Pending Units (Built since 2020 and pipeline) with Income Band**

Project Type	Number of Projects	Number of Units	Income Band
Single-Family Residential	13	13	120% AMI +
Manufactured Home	12	12	80-120% AMI
Middle Housing (2-5 units)	3	10	80-120% AMI
ADU	2	2	0-80% AMI
Community Land Trust (Low-Income)	2	61	0-80% AMI
Community Land Trust (Moderate-Income)	1	10	80-120% AMI

### Lopez Village UGA

In Lopez Village, one CLT project by Housing Lopez is in development at Lopez Village North. Currently 15 units are under construction but the multi-phase project is expected to have 45 units by the end of this 20-year planning horizon.

**Figure 31**  
**Lopez Village UGA Pending Units (Built since 2020 and pipeline) with Income Band**

Project Type	Number of Projects	Number of Units	Income Band
Single-Family Residential	4	4	120% AMI +
Manufactured Home	7	7	80-120% AMI
Middle Housing (2-8 units)	1	8	80-120% AMI
Community Land Trust	1	45	0-80% AMI

### Activity Centers (LAMIRDS) and Rural Areas

In Activity Centers, there has been some single-family, manufactured housing, and triplex development since 2020 and some in the pipeline, in Rosario, the Rural Eastsound Subarea, Deer Harbor, and Orcas Village.

**Figure 32**  
**Activity Center (LAMIRDS) Pending Units (Built since 2020 and pipeline) with Income Band**

<b>Project Type</b>	<b>Number of Projects</b>	<b>Number of Units</b>	<b>Income Band</b>
Single-Family Residential	39	39	120% AMI +
Manufactured Home	6	6	80-120% AMI
Middle Housing (2-8 units)	1	3	80-120% AMI

In Rural Areas, there have been 272 units built since 2020, and there are 292 permits issued in the pipeline for residential development. Per Commerce guidance and the GMA, these units in rural areas are categorized in the high-income (120% AMI+) category.

### Land Capacity

The tables below show the land capacity for housing units by land use designation in UGAs, Activity Centers, and Rural Areas. The total unit capacity was calculated using the vacant, partially-used, and redevelopable parcel acreage (after removing critical areas and market factor deductions), density assumptions, and seasonal, occasional, and recreational use factors discussed throughout this report. The total capacity and associated income band are shown by land use designation for each area.

#### Eastsound UGA

In Eastsound, low-density residential is assumed to serve higher-income households. The ER4P, ER4-12, VC, VCL, and VR/I land use designations allow a variety of housing types including duplexes and townhomes which can serve middle-income households. Therefore, these areas have a base assumption of serving the 80-120% category. Additionally, these are the areas in which Community Land Trusts have been constructing projects in recent years, so a portion of capacity was assigned to the 0-80% band to reflect continued CLT activity in these areas. ER4P is a less dense designation but does allow for an affordable housing density bonus, so a smaller amount of affordable capacity was assumed in this area. Finally, VC and VCL allow up to 40 units per acre which falls into the density category which can serve lower-income households per Commerce guidance. Although units of this density have not been built recently, the potential for affordable units was increased slightly in these areas to reflect this potential for multifamily units during the planning period assuming state or other forms of subsidy were available.

**Figure 33**  
**Unit Capacity and Income Band Classification in Eastsound UGA**

<b>Land Use Designation</b>	<b>Net Unit Capacity</b>	<b>Market-Rate Category</b>	<b>Assumed Affordable %</b>	<b>Market-Rate Units</b>	<b>Affordable Units (0-80%)</b>
ER1	0	120% +	0%	0	0
ER1P	5	120% +	0%	5	0
ER2	15	120% +	0%	15	0
ER2P	11	120% +	0%	11	0

ER412	58	80-120%	50%	29	29
ER4P	52	80-120%	10%	47	5
M	2	80-120%	0%	2	0
VC	62	80-120%	65%	22	40
VCL	12	80-120%	65%	4	8
VR/I	98	80-120%	50%	49	49
Airport 2	0	120% +	0%	0	0
Airport 3 Inner	2	120% +	0%	2	0
Airport 3 Outer	19	80-120%	25%	14	5
Airport 4	4	80-120%	0%	4	0

### Lopez Village UGA

In Lopez Village, the LVR area allows a wide variety of housing types, including apartments, middle housing typologies, and single-family homes. Additionally, Community Land Trust projects have occurred recently in this land use designation. As a result, half of the LVR capacity assigned to 0-80%, and the remainder split between 80-120% and 120%+ income bands to reflect these various potential housing types. The LVC area has a limited capacity of 19 units, which were assigned to the 0-80% category given the emphasis on higher density in that area of the Village.

**Figure 34**  
**Unit Capacity and Income Band Classification in Lopez Village UGA**

Land Use Designation	Net Unit Capacity	120%+ Units	80-120% Units	0-80% Units
LVC	19	0	0	19
LVR	278	69	69	140

### LAMIRDS and Rural Areas

In LAMIRDS, land use designations which only allow single-family development were assigned to the 120%+ category. Areas where duplexes are also allowed were assigned to the 80-120% category, following Commerce guidance. In addition, there are some areas with affordable housing density bonuses, as discussed earlier in this report in the discussion of densities. Based on recent trends, it was assumed that 10% of the acreage of these areas may see affordable housing developed using the density bonus. Because the density bonus increases the allowed density by four to six times, this translates to a 31-53 percent share of units in those areas which would be affordable, since there would be denser development allowed in areas with the affordability bonus. Therefore, a small number of units were assigned to the 0-80% category following this distribution, as shown below in Figure 35.

**Figure 35**  
**Unit Capacity and Income Band Classification in Activity Centers (LAMIRDS)**

Area	Land Use Designation	Net Unit Capacity	Market-Rate Category	Affordable %	Market-Rate Units	Affordable Units
Deer Harbor	HC	0	80-120%	50%	0	0

Deer Harbor	HI	0	120% +	0%	0	0
Deer Harbor	HR	15	80-120%	50%	7	7
Doe Bay	ACT - Doe Bay	3	120% +	71%	1	2
Island Center Lopez	IC (Lopez)	2	80-120%	0%	2	0
Island Center Orcas	IC (Orcas)	5	80-120%	0%	5	0
Marine Center	MC	4	120% +	0%	4	0
Olga	OLGA	3	80-120%	50%	2	2
Orcas Village	OVC	0	120% +	0%	0	0
Orcas Village	OVR2	4	120% +	0%	4	0
Picnic AC	ACT - Picnic AC	2	120% +	0%	2	0
Rosario	2 BDD	22	120% +	33%	15	7
Rosario	ACT - Rosario	14	120% +	50%	7	7
Rural Eastsound Subarea	CCC	0	120% +	0%	0	0
Rural Eastsound Subarea	ER	6	120% +	0%	6	0
Rural Eastsound Subarea	ER4P	64	80-120%	0%	64	0
Rural Eastsound Subarea	ERR	5	80-120%	0%	5	0
Rural Eastsound Subarea	ERRP2	29	80-120%	0%	29	0
Rural Eastsound Subarea	SP	0	120% +	0%	0	0

In rural areas, capacity was generally considered to take the form of single-family units, which serve higher-income households per Commerce guidance. However, as discussed above, there are also a significant amount of mobile or manufactured homes in San Juan County. An analysis of County assessor data indicates that in the AG, FOR, RF, and RR land use designations, mobile or manufactured homes make up between 8 and 14 percent of existing units. Applying these shares to future capacity in those land use designations resulted in a small share of rural capacity being assigned to the 80-120% category, as shown below.

**Figure 36**  
**Unit Capacity and Income Band Classification in Rural Areas**

Land Use Designation	Zone Description	Net Unit Capacity	% Mobile Home	SF Capacity (120%+)	MH Capacity (80-120%)
AG	Agricultural Resource Lands	117	12%	104	14
C	Conservancy	45	0%	45	0
FHUA	Friday Harbor Unincorporated UGA	0	0%	0	0
FOR	Forest Resource Lands	95	14%	82	13
LGRA	Lopez Village Growth Reserve Area	1	0%	1	0
RFF	Rural Farm-Forest	1,318	11%	1,169	148
RG	Rural General Use	0	0%	0	0
RI	Rural Industrial	0	0%	0	0
RR	Rural Residential	219	8%	202	17

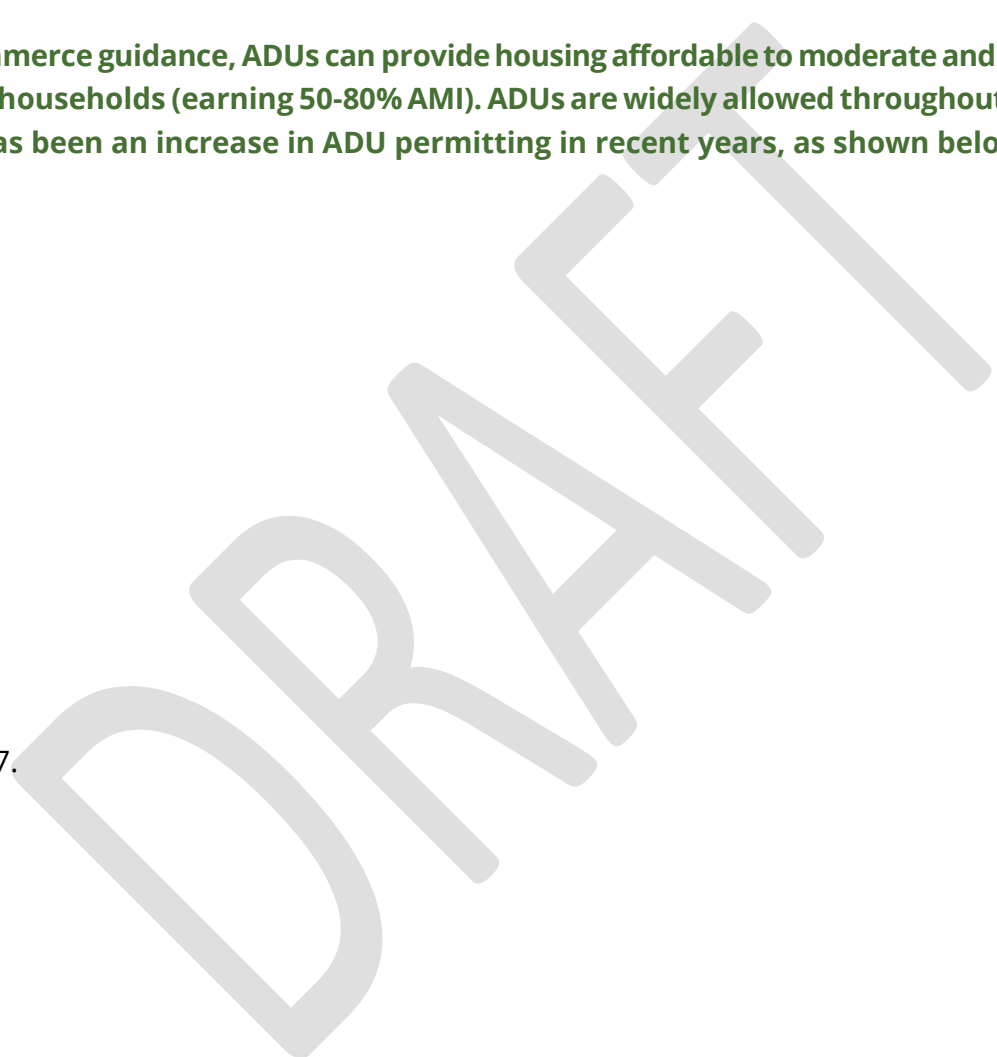
## Other Assumptions

In addition to pending units and the land capacity by land use designation shown above, several additional housing types and areas were considered in this capacity analysis. Per Commerce guidance, ADU capacity was considered as a potential middle-income housing typology, as well as future housing units in master planned resort areas and the potential for a San Juan County-specific form of affordable housing, rural residential clusters.

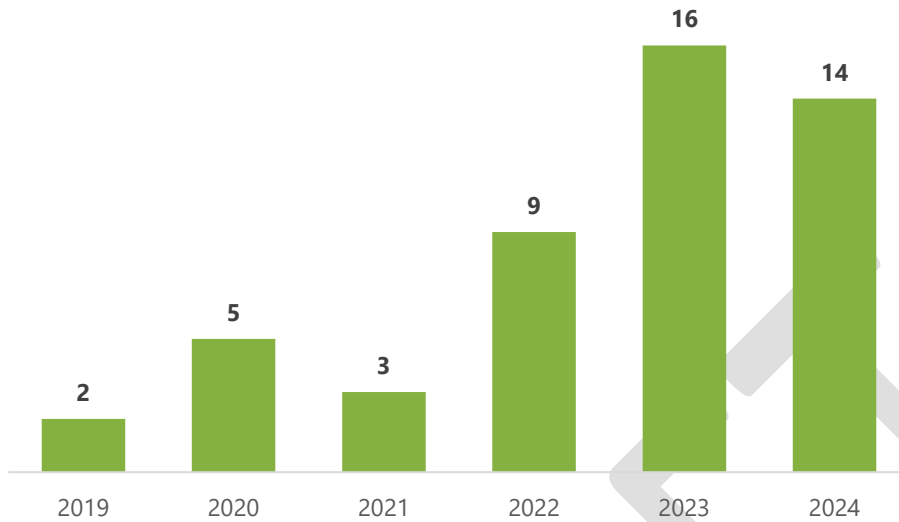
## ADUs

**Per Commerce guidance, ADUs can provide housing affordable to moderate and lower-moderate income households (earning 50-80% AMI). ADUs are widely allowed throughout the County and there has been an increase in ADU permitting in recent years, as shown below in**

Figure 37.



**Figure 37**  
**ADU Permits in San Juan County, 2019-2024**



Source: San Juan County Permit Data

### **Eastsound UGA**

In Eastsound, ADUs are allowed in ER1, ER2, ER 4, ER 4-12, M, SLI, VC, VCL, and VR/I land use designations. In total, there are 403 parcels where an ADU could be developed within these areas. This number was multiplied by a 5 percent potential participation rate, as suggested by Commerce guidance, to represent that only a small number of potential property owners will choose to build an ADU over the planning horizon. This results in a total capacity of 20 ADUs in the Eastsound UGA.

### **Lopez Village UGA**

In Lopez Village, there are a total of 88 parcels where ADUs could be developed. Initially, a similar assumption of 5 percent participation was assumed, for a total capacity of 4 ADUs over the planning horizon. However, feedback from the Lopez Village Planning Review Commission indicated that ADUs have been developed more rapidly in recent years, and there has been increasing interest. Therefore the average of 0.875 ADUs per year in the village since 2016 was multiplied by 20 years for a total ADU capacity of 17.5 ADUs in the Village over the planning horizon.

### **Activity Centers (LAMIRDS) and Rural Areas**

In Activity Centers, in land use designations where ADUs are allowed (HC, HR, ACT, RFF in Island Center, OLGA, 2BDD, CCC, ER, ER4P, ERR, ERRP2, and SP), a similar capacity analysis was conducted, again assuming a 5 percent participation rate, for a total capacity of 28 ADUs in Activity Centers.

In rural areas, ADUs are allowed on lots of 10 acres or more in Agricultural Resource Lands, on lots of 20 acres or more in Forest Resource Lands, and on lots of 5 acres or more in other rural areas. Taking the number of lots meeting these size requirements and assuming a 5 percent uptake rate would result in a capacity for 263 ADUs in rural areas. However, the San Juan County Code limits ADUs in rural areas to 12% of the total building permits for the previous year. This would represent a cap of 160 ADUs over the planning horizon, so the ADU capacity in rural areas was reduced to 160.

**ADU Totals**

The table below in Figure 38 shows the total ADU capacity for the County. Per Commerce guidance, ADUs cannot make up more than 10 percent of total Countywide capacity. As shown, the capacity for 225 ADUs represents 7.8 percent of total countywide capacity. These units are assigned to the 50-80% AMI income band per Commerce’s guidance for moderate-income communities.

**Figure 38**  
**ADU Capacity in San Juan County, 2020-2045, for LCA**

<b>Area</b>	<b>ADU Capacity</b>
Eastsound UGA	20
Lopez Village UGA	17
SAC/LAMIRD	28
Rural	160
<b>Total</b>	<b>225</b>
<i>% of Countywide Capacity</i>	<i>7.8%</i>
<i>not to exceed 10% per Commerce</i>	

**Master Planned Resorts**

San Juan County has three master planned resort areas – Rosario, Roche Harbor, and West Beach Resort. These areas have master plans which contain approved numbers of potential new units. In total, there is the potential for about 150-200 units that have been approved based on these master plans, according to County staff. However, many of these may be vacation rentals and there have also been ownership issues with Rosario in recent years. As a result, no additional units in the Rosario MPR area were considered for this analysis. West Beach is a small areas and unlikely to develop year-round housing so was excluded from this analysis as well.

In 2022, Roche Harbor submitted a proposal to the County for 48 new units, including 24 long term affordable units for employees of the resort and other island residents. Although this indicates that there is some potential for moderate-income units in the Roche Harbor MPR land use designation, the resort has indicated that critical areas and other constraints make development on their existing parcels challenging, so no unit capacity in the Roche Harbor MPR area was assumed in this analysis.

## Rural Residential Clusters

San Juan County Code 18.36.230 contains a provision for affordable housing serving households earning 80% AMI and below in rural areas through cluster development. There is a maximum of 12 units per development, and a cap of 100 total units countywide per decade. Since 2006, there have been four developments built. The current cluster development that is under construction has six units. For this capacity analysis, 40 units in Rural Residential Clusters were assumed for the 2020-2045 planning horizon, serving households earning 80-120% AMI.

## Results and Totals

### Housing Units

The tables below show targets and totals by income band for both UGAs and for Activity Centers and rural areas, as well as a table showing Countywide targets and totals (excluding Friday Harbor)

**Figure 39**  
**Eastsound UGA Housing Needs and Capacity, 2020-2045**

Income Band	Housing Needs	Aggregated Housing Needs	Pending Units	Remaining Needs	Total Capacity	Surplus/ Deficit
0-30 PSH	15					
0-30 Non PSH	175	445	63	382	156	(227)
30-50	150					
50-80	106					
80-100	35	70	32	38	171	133
100-120	35					
120+	0	0	13	-13	33	46
<b>Total</b>	<b>515</b>	<b>515</b>	<b>108</b>	<b>407</b>	<b>359</b>	<b>(48)</b>

**Figure 40**  
**Lopez Village UGA Housing Needs and Capacity, 2020-2045**

Income Band	Housing Needs	Aggregated Housing Needs	Pending Units	Remaining Needs	Total Capacity	Surplus/Deficit
0-30 PSH	7					
0-30 Non PSH	83	220	45	175	175	0
30-50	81					
50-80	49					
80-100	12	24	15	9	69	60
100-120	12					
120+	0	0	4	-4	69	74
<b>Total</b>	<b>244</b>	<b>244</b>	<b>64</b>	<b>180</b>	<b>314</b>	<b>134</b>

**Figure 41**  
**Activity Centers (LAMIRD) and Rural Housing Needs and Capacity, 2020-2045**

Income Band	Housing Needs	Aggregated Housing Needs	Pending Units	Remaining Needs	Total Capacity	Surplus/Deficit
0-30 PSH	0					
0-30 Non PSH	0	213	0	213	213	0
30-50	0					
50-80	213					
80-100	173	348	9	339	347	8
100-120	175					
120+	943	943	603	340	1,641	1,301
<b>Total</b>	<b>1,504</b>	<b>1,504</b>	<b>612</b>	<b>892</b>	<b>2,201</b>	<b>1,308</b>

**Figure 42**

**Total San Juan County (Excluding Friday Harbor) Housing Needs and Capacity, 2020-2045**

<b>Income Band</b>	<b>Housing Needs</b>	<b>Aggregated Housing Needs</b>	<b>Pending Units</b>	<b>Remaining Needs</b>	<b>Total Capacity</b>	<b>Surplus/ Deficit</b>
0-30 PSH	22					
0-30 Non PSH	258	879	108	771	544	(227)
30-50	231					
50-80	368					
80-100	220	442	56	386	587	201
100-120	222					
120+	943	943	620	323	1,743	1,420
<b>Total</b>	<b>2,264</b>	<b>2,264</b>	<b>784</b>	<b>1,480</b>	<b>2,874</b>	<b>1,394</b>

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## Employment

The table below shows the results of the employment capacity analysis using the vacant, redevelopable, and partially-used acreage, critical areas, market factor reductions, and job density assumptions discussed previously in this report.

**Figure 43**  
**San Juan County (Excluding Friday Harbor) Employment Targets and Capacity, 2020-2044**

CCD	Employment Target	Employment Capacity	Surplus
<b>San Juan Island CCD (less Friday Harbor)</b>	<b>938</b>	<b>1,907</b>	<b>970</b>
Rural Areas		1,907	1,907
<b>Orcas Island CCD</b>	<b>494</b>	<b>1,238</b>	<b>743</b>
Eastsound UGA	247	781	534
Activity Centers		457	457
<b>Lopez Island CCD</b>	<b>67</b>	<b>9,633</b>	<b>9,565</b>
Lopez Village UGA	34	432	398
Rural Areas		9,201	9,201
<b>Countywide Total (less Friday Harbor)</b>	<b>937</b>	<b>12,778</b>	<b>11,841</b>

## Discussion & Proposed Land Use Changes

### Summary of Results

#### Housing

As shown above in

Figure 42, San Juan County is showing an overall surplus in housing unit capacity, but a deficit in capacity for units serving lower incomes (0-80% AMI). As a result, the GMA and Commerce Guidance require that the County increase capacity for housing types that can serve these income bands. Housing types that can serve these income bands are primarily considered to be multifamily, although in San Juan County, Community Land Trust developments are also serving these income categories. Figure 39 shows that the County's deficit in lower-income units is contained within the Eastsound UGA. In order to address this deficit, County staff, Otak, and

Leland Consulting Group worked with the Eastsound Planning Review Committee (EPRC), San Juan County Planning Commission, and San Juan County Council in late 2024 and early 2025 to analyze and propose both densification and expansion in the Eastsound UGA to provide sufficient capacity to meet County targets for low- and moderate-income households.

### *Employment*

As shown above in Figure 43, the County and UGAs have sufficient land capacity to meet and exceed employment targets, so no land use changes are required from the perspective of land capacity for employment.

## **Proposed Eastsound UGA Land Use Changes**

### *UGA Upzoning*

**Two areas of the UGA were selected for densification, based on prevalence of vacant, partially-used, and redevelopable parcels, lack of critical areas, adjacency to higher-density areas, and input from the EPRC, Planning Commission, and Council. These areas are shown below in**

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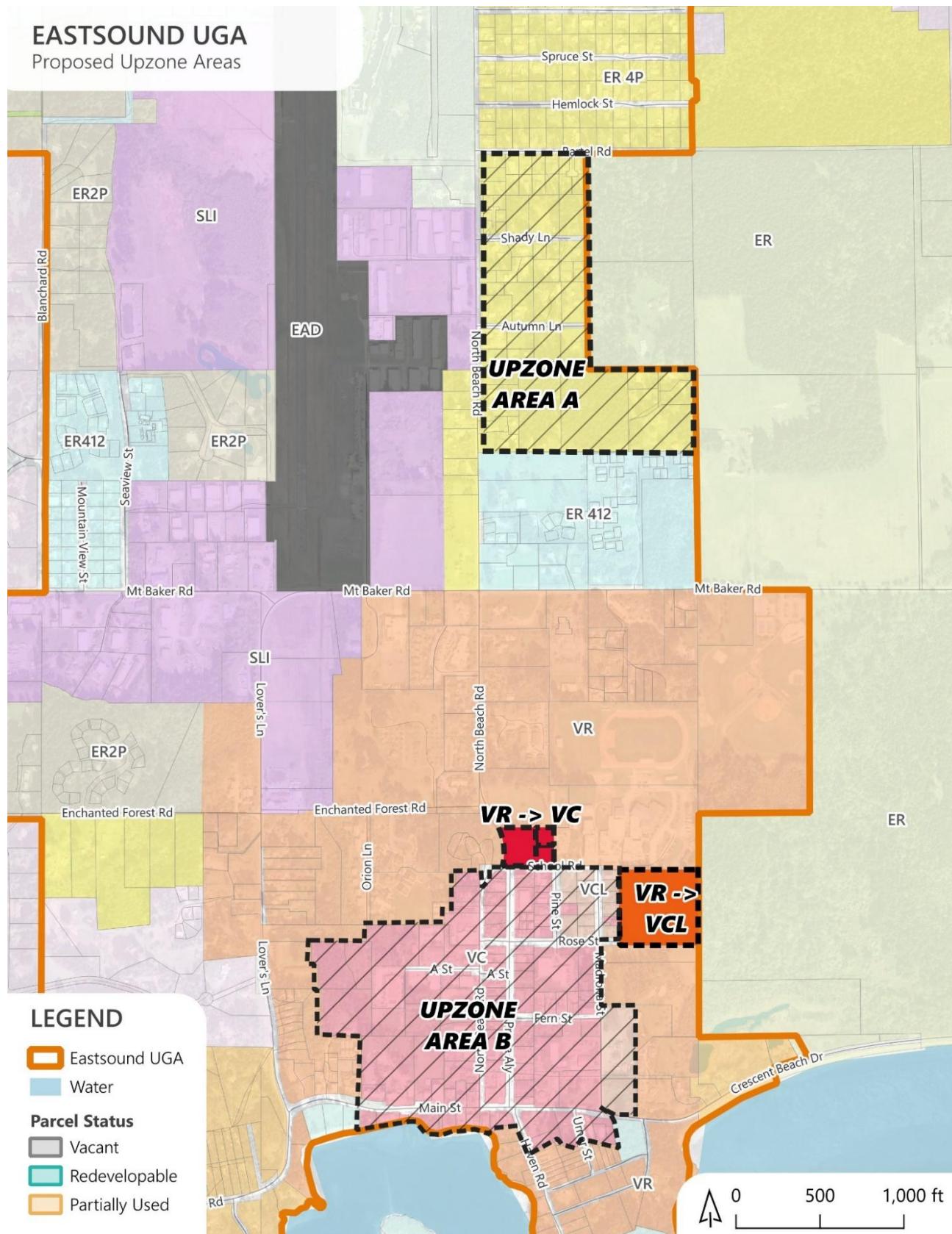
Figure 44.

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**Figure 44**

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**Eastsound UGA Proposed Upzone Areas**



Upzone Area A comprises part of the Eastsound Residential – 4 units/acre (ER4P) area in the northeast of the UGA. Following Council direction, the analysis of increased density in Upzone Area A was limited to the area east of North Beach Road between Bartel Road and Twigs Lane. This area currently allows 4 units per acre but is immediately adjacent to an area south of Twigs Lane which allows 12 units per acre. Extending the ER412 land use designation north to include this area would increase capacity for units serving low-income households by **39** additional units.

**The VC and VCL land use designations currently allow up to 40 units an acre, but the minimum density is 4 units per acre. The team analyzed the implications of restricting low density single-family development in this area by increasing the minimum density to 12 units per acre. Based on assumptions made in the LCA process, this would add capacity for an additional 28 units of housing that could serve low-income households. Following Council direction, four vacant parcels adjacent to the VC designation were also considered for rezoning from VR to VC or VCL, shown in red and orange, respectively, on the map in**

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Figure 44. These parcels would add capacity for an additional **20** units of low-income housing.

**In total, these upzones within the UGA would add capacity for 114 total units, 89 of which could serve households earning 0-80 percent AMI. This additional capacity from densification is not sufficient to address the 227-unit deficit at 0-80 percent AMI shown above in**

Figure 42.

WAC 365-196-310(4)(b)(4) states:

*If future growth forecasts exceed current capacities, counties and cities should first consider the potential of increasing capacity of existing urban areas through allowances for higher densities, or for additional provisions to encourage redevelopment. If counties and cities find that increasing the capacity of existing urban areas is not feasible or appropriate based on the evidence they examine, counties and cities may consider expansion of the urban growth area to meet the future growth forecast.*

**Following this guidance, before considering UGA expansion areas, the team analyzed the potential for increased densities in Lopez Village to potentially address some of the deficit. However, the majority of vacant and redevelopable land in Lopez Village, particularly in the central area with the Commercial land use designation where denser housing may be appropriate, is highly environmentally constrained, and the overall land supply is limited, as shown below in**

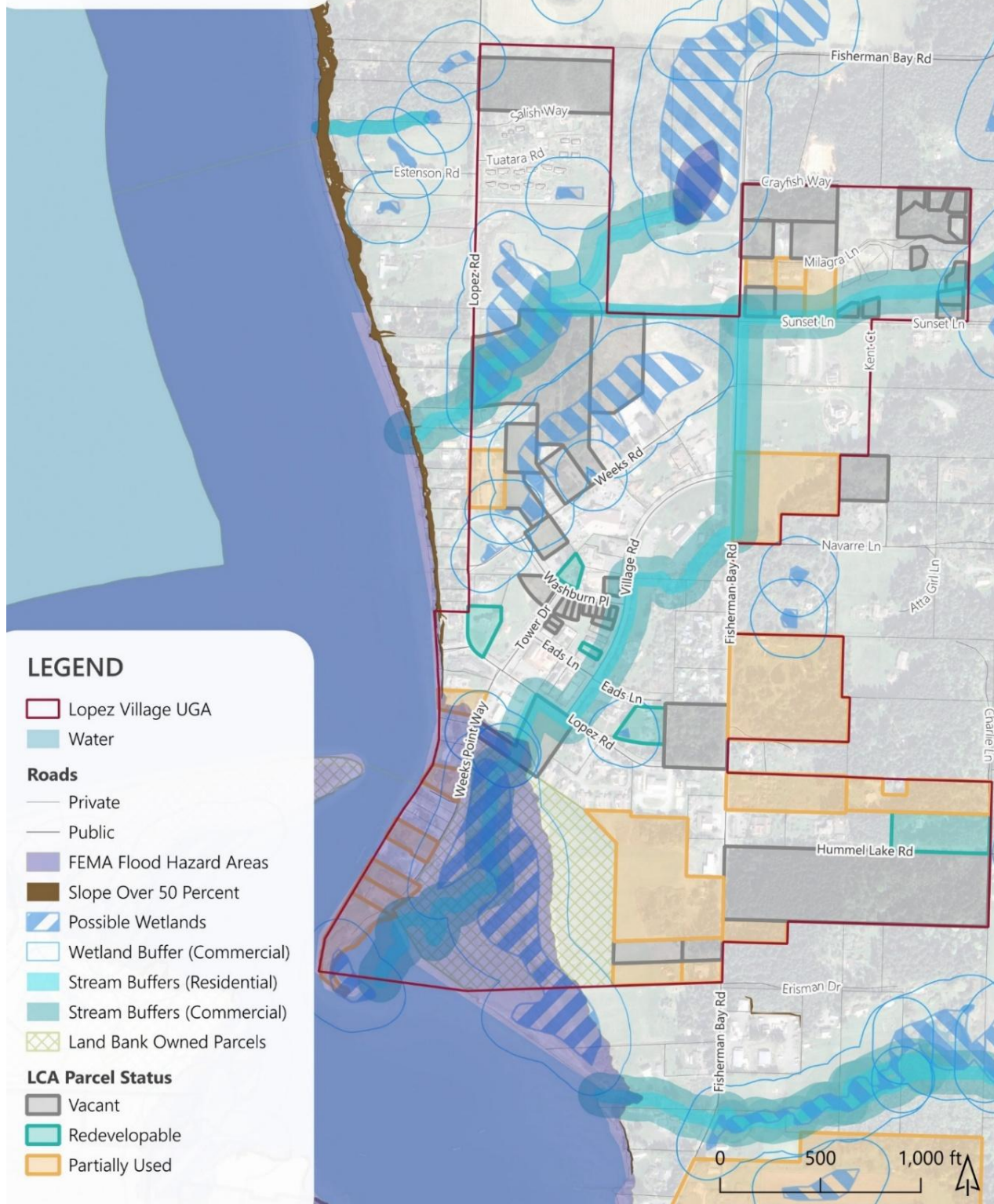
Figure 45. Additionally, input from the Lopez Village Planning Review Committee indicated numerous known deed restrictions on some of the larger available parcels which preclude further densification. Even with additional development capacity in Lopez Village, development there is unlikely to substantially address the County's deficit of over 200 units serving low-income households, both because development is unlikely to occur at high enough densities, and because

the Lopez Island housing market operates separately from the Orcas Island, where the deficit has been identified.

**Figure 45**  
**Lopez Village UGA Critical Areas and Land Capacity Analysis Parcel Classifications**

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**LOPEZ VILLAGE UGA**  
Critical Areas with LCA

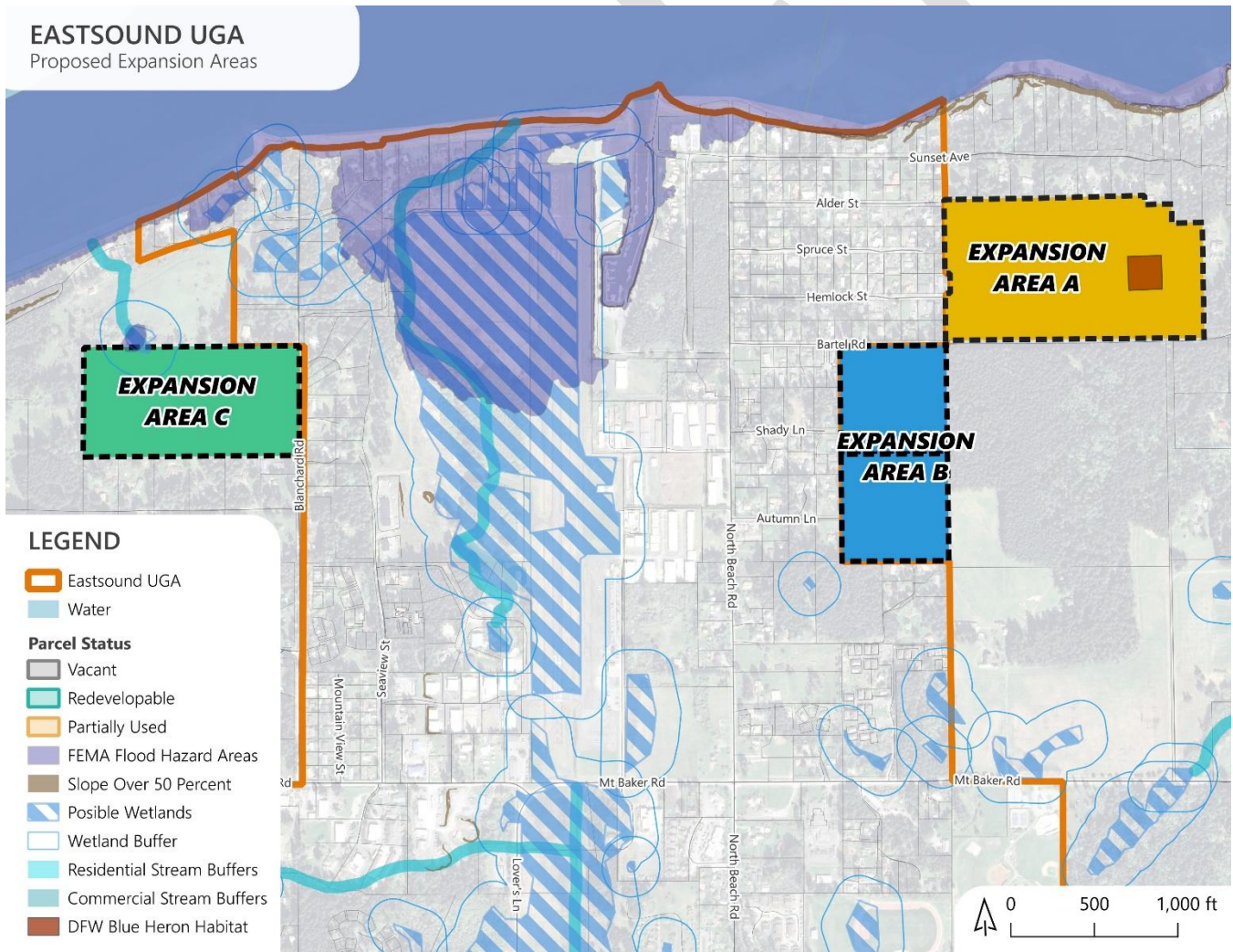


*UGA Expansion*

Given that the proposed upzoning outlined above does not sufficiently address the County’s deficit at 0-80 percent AMI, and the lack of potential to increase density in Lopez Village, the team analyzed the potential to address the remaining capacity shortfall through limited UGA expansion in Eastsound. A number of areas were considered, based on proximity to the UGA boundary, availability of vacant land, property ownership, and size. Through an iterative process with the Eastsound Planning Review Commission, County Planning Commission, and staff, three proposed expansion areas have been identified. Together with the upzoning described previously, these areas will provide sufficient capacity for the County to reach its targets for low- and moderate-income housing capacity. These areas are shown below in

Figure 46.

**Figure 46**  
**Eastsound UGA Proposed Expansion Areas**



#### Area A

Immediately to the east of the UGA along Bartel Road is a parcel owned by the OPAL community land trust, labeled "Expansion Area A" above. The parcel is at least partially served by utilities and OPAL has expressed a desire to develop affordable housing on this parcel in the past. The Comprehensive Plan project team met with OPAL regarding their potential development densities on this parcel, indicating 6 dwelling units/acre, which means that over the 20-year period, this parcel could potentially accommodate up to **107** additional units serving low-income households earning 80 percent Area Median Income or below, as well as 36 additional units at 80-120 percent AMI, based on OPAL's estimates of the income levels they are serving in their developments. Staff are continuing to investigate the existing and potential future infrastructure needed to support development on this parcel.

#### *Blue heron habitat considerations*

**Comments provided to the County by the Department of Fish and Wildlife (DFW) indicated the presence of blue heron habitat on the OPAL parcel. Their publicly available dataset indicates that 10 nests were present in 1991, with no nests found in 2004, though the habitat was still intact. The DFW mapped habitat area is shown above in the map in**

Figure 46. Reviewing County guidelines for critical areas in SJCC 18.35.115, a buffer of 200 feet is required around blue heron nests, and construction must be limited to non-nesting months within ¼ mile radius. The DFW's polygon has a width of 200 feet, though it is not clear if this is the buffer around the habitat site, or if an additional buffer would be required. The polygon as currently mapped is 0.9 acres in area. As the County moves forward in this process, further study of this area will likely be necessary to determine if the nests or habitat are still present, and more detailed mapping would be required to determine the impact on future development. The presence of this habitat may impede the potential to fully develop the parcel, but even with an additional buffer added around this polygon, there is likely still substantial capacity for housing on the remainder of the parcel.

#### Area B

Area B is comprised of two parcels in a "cutout" of the eastern side of the UGA under one property owner, and if upzoned to ER412, could provide capacity for **40** units serving 0-80 percent AMI households.

#### Area C

Area C has reportedly been recently cleared of trees and is adjacent to Blanchard Road, which has more capacity at present than Bartel Road. This area, if upzoned to ER412, could provide capacity for **45** additional low-income units.

## Conclusion

Taken together, the land use changes and UGA expansions detailed above increase the capacity for units serving households earning 0-80 percent AMI in the Eastsound UGA by 278 units. This results in a surplus of 52 units at this income level in the UGA.

Figure 47 below shows the results of the revised countywide UGA incorporating the Eastsound upzoning and expansion proposals (with the original deficit shown for reference).

**Figure 47**  
**San Juan County Land Capacity Analysis by Income Band with Land Use Revisions**

Income Band	Housing Needs	Aggregated Housing Needs	Pending Units	Remaining Needs	Total Capacity	Revised Surplus/Deficit	Original Surplus/Deficit
0-30 PSH	22						
0-30 Non PSH	258						
30-50	231	879	108	771	822	52	(227)
50-80	368						
80-100	220	442	56	386	669	282	201
100-120	222						
120+	943	943	620	323	1,743	1,420	1,420
<b>Total</b>	<b>2,264</b>	<b>2,264</b>	<b>784</b>	<b>1,480</b>	<b>3,234</b>	<b>1,754</b>	<b>2,874</b>

Figure 48 below shows details of the additional housing units at each income band generated by each proposed land use change and expansion described previously.

**Figure 48**  
**Detail of Increased 0-80% AMI Housing Capacity Resulting From Proposed Changes in Eastsound UGA**

Area	Parcel Number	Change	Net New Units		
			0-80%	80-120%	120% +
Eastern VR addition	271414003000	Change zoning from VR to VCL	15	4	0
Northern VR addition	271414021000	Change zoning from VR to VC	3	1	0
Northern VR addition	271414023000	Change zoning from VR to VC	1	1	0
Northern VR addition	271414024000	Change zoning from VR to VC	1	0	0
OPAL Parcel (Expansion Area A)	271223009000	Add to UGA at 6 du/ac assumed density	107	36	0
Eastern Upzone Area		Change zoning from ER4P to ER412	39	4	0
VC/VCL		Increase VC/L min density from 4 to 12 du/ac	28	15	0
Eastern "Cutout" Parcels (Expansion Area B)	271141001000	Add to UGA with ER412 density	20	20	0
Eastern "Cutout" Parcels (Expansion Area B)	271141002000	Add to UGA with ER412 density	20	20	0
NW "Cleared" Parcel (Expansion Area C)	271132003000	Add to UGA with ER412 density	45	44	0
<b>Total Capacity</b>			<b>279</b>	<b>145</b>	<b>0</b>
<b>Initial Surplus/Deficit</b>			<b>-227</b>	<b>133</b>	<b>46</b>
<b>Revised Surplus/Deficit</b>			<b>52</b>	<b>278</b>	<b>46</b>

In addition to housing, the rezoning of four parcels from VR to VC or VCL will have a minor effect on the employment capacity in the county, increasing the employment capacity in the Eastsound UGA from 781 jobs to 804, as shown below in

Figure 49.

**Figure 49**  
**Revised San Juan County Employment Capacity with Proposed Eastsound Rezoning, 2020-2045**

	Employment Target	Employment Capacity	Revised Surplus	Original Capacity	Original Surplus
<b>San Juan Island CCD (less Friday Harbor)</b>	<b>938</b>	<b>1,907</b>	<b>970</b>	<b>1,907</b>	<b>970</b>
Rural Areas		1,907	1,907	1,907	970
<b>Orcas Island CCD</b>	<b>494</b>	<b>1,260</b>	<b>766</b>	<b>1,238</b>	<b>743</b>
Eastsound UGA	247	804	557	781	534
Activity Centers		457	457	457	457
<b>Lopez Island CCD</b>	<b>67</b>	<b>9,633</b>	<b>9,565</b>	<b>9,633</b>	<b>9,565</b>
Lopez Village UGA	34	432	398	432	398
Rural Areas		9,201	9,201	9,201	9,201
<b>Countywide Total (less Friday Harbor)</b>	<b>937</b>	<b>12,800</b>	<b>11,864</b>	<b>12,778</b>	<b>11,841</b>

No single expansion or upzoning is sufficient to address the deficit of housing units serving 0-80 percent AMI, but by adopting all of these land use changes and UGA expansions concurrent with this Comprehensive Plan Update, San Juan County can demonstrate sufficient capacity to meet its state-designated targets for housing at all income levels over the next 20 years. Each of these upzoning and expansion areas has its own unique challenges and opportunities. A combination of all of these options can provide both capacity for the County to reach its housing targets as well as

a sufficient buffer to account for varied property ownership, environmental constraints, and other barriers to development which may arise.

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